Exelon Generation

200 Exelon Way
Kennett Square, PA 19348

www.exeloncorp.com

10 CFR 50.90
10 CFR 50.54(q)

January 15, 2019

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

R.E. Ginna Nuclear Power Plant
Renewed Facility Operating License No. DPR-18
NRC Docket Nos. 50-244 and 72-67

Subject: License Amendment Request for Approval of Changes to Emergency Plan Staffing Requirements

Pursuant to 10 CFR 50.90, *"Application for amendment of license, construction permit, or early site permit,"* Exelon Generation Company, LLC (Exelon) requests an amendment to the Renewed Facility Operating License No. DPR-18 for the R.E. Ginna Nuclear Power Plant (Ginna).

10 CFR 50.47(b) and 10 CFR 50, Appendix E establish emergency planning standards that require: 1) adequate staffing, 2) satisfactory performance of key functional areas and critical tasks, and 3) timely augmentation of the response capability.

Exelon is requesting U.S. Nuclear Regulatory Commission (NRC) approval of proposed changes to the Radiological Emergency Preparedness Plan for Ginna. The docket number for the Ginna Independent Spent Fuel Storage Installation (ISFSI) is also referenced, since the site's Emergency Plan covers emergency planning aspects for the ISFSI. The proposed changes would revise certain Emergency Response Organization (ERO) positions for Ginna consistent with the minimum staff ERO guidance specified in the "Alternative Guidance for Licensee Emergency Response Organizations," finalized in a letter from the NRC to the Nuclear Energy Institute (NEI), dated June 12, 2018. The guidance will be included 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."*

The proposed changes have been reviewed considering the requirements of 10 CFR 50.47, *"Emergency plans,"* paragraph (b), 10 CFR 50 Appendix E, "*Emergency Planning and Preparedness for Production and Utilization Facilities,"* and other applicable emergency preparedness NRC guidance documents. An evaluation of the proposed changes pursuant to 10 CFR 50.54, *"Conditions of licenses,"* paragraph (q), *"Emergency plans,"* determined that the proposed changes would constitute a reduction in effectiveness of the Emergency Plans for the affected facility and, therefore, require prior NRC approval.

Exelon has concluded that the proposed changes present no significant hazards consideration under the standards set forth in 10 CFR 50.92, *"Issuance of amendments."*

The proposed changes have been reviewed by the Plant Operations Review Committee at Ginna in accordance with the requirements of the Exelon Quality Assurance Program.

Enclosure 1 contains an evaluation of the proposed changes, which includes a detailed description, technical and regulatory evaluation supporting a no significant hazards consideration, and environmental consideration. Supporting Attachments 1A through 1C include Emergency Plan mark-up pages, clean pages, and an assessment of the ERO Minimum Staff and Full-Augmented Staff positions removed. Enclosure 2 of this submittal includes regulatory commitments describing Exelon's plans to conduct confirmation Emergency Preparedness drills to demonstrate that no loss of function will result due to the proposed changes in the ERO. Enclosure 3 contains information related to the review of proposed changes by the affected State and Counties.

Exelon is requesting approval of the proposed license amendment by September 1, 2019, which is the same date that Exelon requested similar ERO staffing changes for its Midwest (Braidwood, Byron, Clinton, Dresden, LaSalle, and Quad Cities), Mid-Atlantic (Limerick, and Peach Bottom), and Northeast (Calvert Cliffs, Nine Mile Point, and FitzPatrick) sites. Once approved, Exelon is requesting that the amendment for the Ginna be implemented no later than December 31, 2019.

In accordance with 10 CFR 50.91, *"Notice for public comment; State consultation,"* paragraph (b), Exelon is notifying the State of New York of this application for these license amendments by transmitting a copy of this letter and the supporting attachments to the designated State Official.

If you have any questions regarding 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 15th day of January 2019.

Respectfully,

David T. Gudger

David T. Gudger
Manager, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Enclosures (including supporting attachments):

1) R.E. Ginna Nuclear Power – Evaluation of Proposed Changes
    - Attachment 1A - Emergency Plan Marked-up Pages - R.E. Ginna Nuclear Power Plant
    - Attachment 2A - Emergency Plan Clean Copy Pages - R.E. Ginna Nuclear Power Plant
    - Attachment 3A - Assessment of R.E. Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed
2) Summary of Regulatory Commitments
3) Information Related to Review of Proposed Changes by the State and Counties

cc: w/ Enclosures (including supporting attachments)
Regional Administrator - NRC Region I
NRC Senior Resident Inspector - R.E. Ginna Nuclear Power Plant
NRC Project Manager, NRR - R.E. Ginna Nuclear Power Plant
A. L. Peterson - NYSERDA

License Amendment Request

ENCLOSURE 1

Evaluation of Proposed Changes

Enclosure 1

License Amendment Request

R.E. Ginna Nuclear Power Plant
Renewed Facility Operating License Nos. DPR-18
NRC Docket Nos. 50-244 and 72-67

EVALUATION OF PROPOSED CHANGES

Subject: License Amendment Request for Approval of Changes to Emergency Plan Staffing Requirements

Supporting Attachments

Attachment 1A - Emergency Plan Marked-up Pages
Attachment 1B - Emergency Plan Clean Copy Pages
Attachment 1C - Assessment of ERO Minimum Staff and Full Augmented Staff Positions Removed

1.0 SUMMARY DESCRIPTION

10 CFR 50.47(b) and 10 CFR 50, Appendix E establish emergency planning standards that require: 1) adequate staffing; 2) satisfactory performance of key functional areas and critical tasks; and 3) timely augmentation of the response capability.

Exelon Generation Company, LLC (Exelon) is requesting NRC approval of a proposed revision to the R.E. Ginna Nuclear Power Plant (Ginna) Radiological Emergency Preparedness Plan. The proposed changes would revise certain Emergency Response Organization (ERO) positions in the Ginna Emergency Plan. Specifically, the proposed changes would revise certain ERO positions to align with the Alternative Guidance for Licensee Emergency Response Organizations (Alternative Guidance) finalized in a letter from the NRC to NEI, dated June 12, 2018. The guidance will be included 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"* (referred to as NUREG-0654 hereafter) when published.

The proposed changes will also relocate the identified Full Augmentation ERO specified in the R. E. Ginna Nuclear Power Plant Emergency Plan Annex EP-AA-1012, Table 2-1, *"Minimum Staffing Requirements for the ERO"* to an Emergency Preparedness Implementing Procedure (EPIP).

The proposed changes have been reviewed considering the requirements of 10 CFR 50.47, *"Emergency plans,"* paragraph (b), 10 CFR 50 Appendix E, "*Emergency Planning and Preparedness for Production and Utilization Facilities,"* and other applicable emergency preparedness NRC guidance documents. An evaluation of the proposed changes pursuant to 10 CFR 50.54, *"Conditions of licenses,"* paragraph (q), *"Emergency plans,"* determined that the proposed changes result in a reduction in effectiveness of the Emergency Plans for the affected facilities and, therefore, require prior NRC approval.

As specified in Enclosure 2 of this submittal for Ginna, Exelon has committed to conduct a confirmation Emergency Preparedness (EP) Drill at one of the Exelon stations with the proposed minimum staff personnel to demonstrate that sufficient staffing capabilities will remain and no loss of EP function will result due to the proposed changes in the ERO staffing.

2.0 DETAILED DESCRIPTION

2.1 Proposed Changes

2.1.1 The content and format of the Ginna Emergency Plan Annex EP-AA-1012, Figure 2-1, *"Minimum On-Site Staffing Requirements,"* will be revised to align with the NRC's Alternative Guidance. This includes revisions to the EP Functions and Major Tasks, as well as the Minimum Staff assigned to these areas. The proposed changes will result in a change in some designated Minimum Staff responders and the relocation of the Full Augmentation staff from the Emergency Plan to Ginna EPIPs, consistent with the NRC's Alternative Guidance.

The specific wording changes are provided in Attachments 1A and 1B of this enclosure as marked-up and clean copy Emergency Plan pages, respectively. Attachment 1C

contains a task assessment of the Minimum Staff and Full-Augmented Staff removed from the Ginna Emergency Plan. Enclosure 3 of the License Amendment Request contains information related to the review of the proposed changes by the State of New York.

2.1.2 On-Shift ERO Revision Summary

The Ginna on-shift staff will align with the NRC's Alternative Guidance. The proposed changes to align the Ginna Emergency Plan Annex EP-AA-1012, Figure 2-1 with the NRC's Alternative Guidance for the on-shift ERO are described below.

- The reference to Fire Brigade personnel will be removed. The Function will be controlled per the Fire Protection Program Report.
- The First Aid and Rescue EP Function is removed from the Table, consistent with the NRC's Alternative Guidance.
- The Shift Chemistry Technician is removed from the on-shift staff.

The table below identifies the current and proposed Ginna on-shift ERO staffing positions for each EP Function identified in the NRC's Alternative Guidance.

An on-shift analysis utilizing the guidance and methodology in NEI 10-05, *"Assessment of On-Shift Emergency Response Organization Staffing and Capabilities,"* concluded that the proposed changes did not result in conflicting duties for on-shift ERO personnel.

EP Function (based on the NRC's Alternative Guidance)	Current On-Shift Staff Positions	Proposed On-Shift Staff Positions
Command and Control	(1) Shift Emergency Director	(1) Shift Emergency Director
Communications	(1) Shift Communicator	(1) Shift Communicator
Radiation Protection	(1) RP Technician	(2) RP Personnel
Supervision of RP	N/A	(1) Shift Emergency Director

EP Function (based on the NRC's Alternative Guidance)	Current On-Shift Staff Positions	Proposed On-Shift Staff Positions
Dose Assessment Projections	Shift Dose Assessor (Collateral duty)	(1) Shift Dose Assessor (Collateral duty)
Emergency Classifications	N/A	(1) Emergency Classification Advisor (Collateral Duty)
Engineering	(1) Shift Technical Advisor (STA) (Collateral Duty)	(1) STA (Collateral Duty)
Security	Per the Security Plan	Per the Security Plan
Fire Fighting/Fire Brigade	Fire Brigade & Lead	N/A
First Aid / Rescue Operations	(3) Fire Brigade members (Collateral Duty)	N/A
Radiation Accident Assessment (Chemistry/Radio Chemistry)	(1) Shift Chemistry Technician	N/A

2.1.3 Minimum Staffing

The Ginna Minimum Staff ERO is revised to be consistent with the finalized staffing numbers found in the NRC's Alternative Guidance with some exceptions that include:

- No Technical Support Center (TSC) Dose Assessor. This is deemed to be acceptable because the Ginna Emergency Operations Facility (EOF) is activated at a lower classification level than required by the NUREG-0654 guidance for escalating events. The TSC Dose Assessor is not considered necessary because the Ginna EOF will activate at 60 minutes of an Alert or higher Emergency Classification Level (ECL) and will include an EOF Dose Assessment Coordinator as Minimum Staff.
- The on-site Field Monitoring Team will not include a driver. Due to the configuration and size of the site within and around the Protected Area (PA), a vehicle would not be needed to traverse the site.
- The EOF Information Technology (IT) Lead (Computer Specialist) is proposed to be staffed within 90 minutes of an Alert rather than 60 minutes of a Site Area Emergency.
- The TSC will not have an IT Lead staffed at 90 minutes.

- The EOF will not staff an additional NRC Communicator at a Site Area Emergency

The following ERO positions will be added to the Ginna Emergency Plan as Minimum Staff consistent with the NRC's Alternative Guidance:

- TSC Security Coordinator
- EOF Dose Assessment Coordinator
- EOF Computer Specialist (staffed at 90 minutes from an Alert)
- JIC Public Information Director
- OSC Onsite Field Team Member
- OSC RP Personnel (2)
- OSC Mechanical Maintenance Supervisor / Lead
- OSC Electrical Maintenance Supervisor / Lead
- OSC I&C Maintenance Supervisor / Lead

The following ERO support positions will no longer be considered Minimum Staff under the Ginna Emergency Plan and will be designated as Full-Augmented Staff. The Full-Augmented ERO Staff will be managed under an EPIP consistent with the NRC's Alternative Guidance.

- TSC Director
- TSC Maintenance Manager
- TSC Technical Manager
- EOF Director
- EOF Technical Advisor
- EOF Environmental Coordinator
- OSC Chemistry Personnel
- OSC Chemistry Lead
- Assistant OSC Director
- JIC Media Monitor/Rumor Control Coordinator
- JIC Logistics Manager
- JIC Technical Advisor

Additional changes include:

- One (1) of the current Table 2-1, RP Personnel will be changed from 60-minute responders to 90-minute responders consistent with the NRC's Alternative Guidance.
- The 30-Minute RP Technician will be changed to be on-shift.

The Ginna minimum ERO staff positions are being revised as follows:

Current Minimum Staff Positions	**Proposed Minimum Staff Positions** (response times are 60 minutes unless otherwise noted)
Technical Support Center (TSC)	
Station Emergency Director	No Change
Operations Manager	Operations Manager (Emergency Classification Advisor)
ENS Communicator	No Change
Rad Protection Manager	No Change
Core Thermal/Hydraulic Engineer	No Change
Mechanical Engineer	No Change
Electrical Engineer	No Change
Technical Manager	**Relocated** to EPIP as Full Augmentation
Maintenance Manager	**Relocated** to EPIP as Full Augmentation
TSC Director	**Relocated** to EPIP as Full Augmentation
(new)	**Added** Security Coordinator
Emergency Operations Facility (EOF)	
Corporate Emergency Director	No Change
State / Local Communicator	No Change
Radiation Protection Manager	No Change
EOF Director	**Relocated** to EPIP as Full Augmentation
Environmental Coordinator	**Relocated** to EPIP as Full Augmentation
(new)	**Added** Dose Assessment Coordinator
(new)	**Added** EOF Computer Specialist @ 90 min
Offsite Field Team #1 Personnel	No Change
Offsite Field Team #1 Driver	No Change
Offsite Field Team #2 Personnel	Offsite Field Team Personnel (@ 90 min.)
Offsite Field Team #2 Driver	Offsite Field Team Driver (@ 90 min.)
Joint Information Center (JIC)	
Company Spokesperson	Corporate Spokesperson (@ 90 min.)
JIC Manager	JIC Director (@ 90 Min)
(new)	**Added** Public Information Director (@ 90 min.)
Media Monitor / Rumor Control Coord	**Relocated** to EPIP as Full Augmentation
Logistics Manager JIC	**Relocated** to EPIP as Full Augmentation
Technical Advisor JIC	**Relocated** to EPIP as Full Augmentation
Operations Support Center (OSC)	
OSC Director	No Change
RP Tech #1 (Onsite Surveys)	RP Tech #1
RP Tech #2 (Onsite Surveys)	RP Tech #2
Onsite Monitoring Team Member #1	No Change
Onsite Monitoring Team Member #2	**Changed to RP Tech #3**
RP Personnel #1 (In-Plant Surveys)	RP Tech #3
RP Personnel #2 (In-Plant Protective Actions)	RP Tech #4 (@ 90 min.)
(New)	**Add** RP Personnel (@ 90 min)

Current Minimum Staff Positions	Proposed Minimum Staff Positions (response times are 60 minutes unless otherwise noted)
(New)	**Add** RP Personnel (@ 90 min.)
I&C Maintenance #1	No Change
Electrical Maintenance #1	No Change
Mechanical Maintenance #1	No Change
(New)	**Add** Group Lead - Elec. Maint @90 min
(New)	**Add** Group Lead - Mech Maint @90 min
(New)	**Add** Group Lead - I&C @90 min
RP Group Lead	Rad Protection Supv/Lead (@90 min.)
Chemistry Personnel	**Relocated** to EPIP as Full Augmentation
Chemistry Lead	**Relocated** to EPIP as Full Augmentation
Assistant OSC Director	**Relocated** to EPIP as Full Augmentation

2.1.4 Full-Augmented Staff

The Ginna Full-Augmented Staff will be described in the station EPIPs. The Ginna Full-Augmented Staff will continue to be notified to respond at an Alert or higher ECL at the same time as the Minimum Staff personnel; however, the Full Augmentation ERO response is not required to activate the Emergency Response Facility (ERF).

Position	Disposition
Technical Support Center (TSC)	
Operations Communicators (TSC)	Position relocated to EPIP
Operations Communicators (MCR)	Position relocated to EPIP
Security Coordinator	Position reclassified as Min Staff
Admin Staff	Position relocated to EPIP
TSC Computer Specialist	Position relocated to EPIP
Emergency Operations Facility (EOF)	
EOC Communicator (EOF)	Position relocated to EPIP
Logistics Manager (EOF)	Position relocated to EPIP
Dose Assessor (2 ea)	Position relocated to EPIP
County EOC Liaison (2 ea.)	Position relocated to EPIP
State EOC Liaison	Position relocated to EPIP
EOF Operations Communicator	Position relocated to EPIP
Admin Staff (2 ea.)	Position relocated to EPIP
HPN Communicator	Position relocated to EPIP
EOF Computer Specialist	Position reclassified as Min Staff

Joint Information Center (JIC)	
News Writer	Position relocated to EPIP
JIC Security	Position relocated to EPIP
Media Liaison	Position relocated to EPIP
Inquiry Phone Team (2 ea.)	Position relocated to EPIP
Media Monitor Team (2 ea.)	Position relocated to EPIP
Admin Staff (2 ea.)	Position relocated to EPIP
Operations Support Center (OSC)	
OSC Team Tracker	Position relocated to EPIP
Admin Staff (2 ea.)	Position relocated to EPIP
OSC Operations Communicator	Position relocated to EPIP

2.2 Reason for the Proposed Changes

The Ginna Emergency Plan is being revised to align with the recently issued Alternative Guidance. The revision to the NUREG-0654 guidance reflects changes to NRC regulations, guidance, and policies, as well as advances in technology and best practices that have occurred since the NUREG-0654 guidance was originally issued in November 1980.

2.3 Ginna Emergency Plan Background

Ginna Station is located in Wayne County, near Rochester, New York. The Ginna reactor is a pressurized light water moderated and cooled system designed by Westinghouse. Ginna Station is located on the south shore of Lake Ontario, in the town of Ontario, Wayne County, and is approximately 20 miles east-northeast of the center of Rochester and 45 miles west-southwest of Oswego. Ginna Station began commercial operation in July 1970.

The Ginna Emergency Preparedness Plan consists of the Exelon Nuclear Standardized Radiological Emergency Plan (EP-AA-1000) and a Station Emergency Plan Annex (EP-AA-1012). Additionally, the program provides direction and guidance through EPIPs, and associated program administrative documents. The Emergency Plan outlines the basis for response actions that would be implemented in an emergency. Planning efforts common to all Exelon nuclear stations are encompassed within the Exelon Standardized Emergency Plan. The Standardized Emergency Plan establishes the concepts, evaluation and assessment criteria, and protective actions that are necessary to limit and mitigate the consequences of potential or actual radiological emergencies.

The Ginna Annex generally contains information and guidance that is unique to the station. The Annex and associated Addendums address site-specific criteria including:

- ERO Staffing
- Emergency Action Levels (EALs) located in Addendum 3 to the station Annex.

- Differences from the Standardized Emergency Plan (such as station-specific staffing commitments, unique aspects of ERO augmentation, etc.).
- Facility geography and location for a full understanding and representation of the station's emergency response capabilities.
- Plant specific facilities and equipment associated with the Emergency Preparedness Program.

2.3.1 R. E. Ginna Nuclear Power Plant Emergency Procedures, January 1969 – The Ginna original Emergency Planning actions were described in the FSAR, chapter 12. The description did not specify designated ERO positions, but referenced supervisory personnel on call who would respond to emergency conditions.

2.3.2 R. E. Ginna Nuclear Emergency Response Plan, Rev 0, July 1984 - On November 13, 1980, licensees were notified that the site EP would be reviewed in accordance with 50.47(b), Appendix E, and NUREG-6454IFEMA-REP-I. Revision 1. In July 1984, Ginna issued Revision 0 to the Nuclear Emergency Response Plan. The Plan incorporated guidance from NUREG 0654, Revision 1 and included Table 4.1 for Staff Responsibilities for Nuclear Power Plant Emergencies.

2.3.3 Minimum On-Shift and Augmentation Requirements for Radiological Emergencies at R.E. Ginna Nuclear Power Plant, Safety Evaluation, July 24, 2003. The Safety Evaluation established a new Licensing Basis for the Ginna on-shift and Minimum Staff Emergency Response Organization in response to proposed enhancements.

2.3.4 R. E. Ginna Nuclear Power Plant Emergency Response Plan. In February 2014, the Ginna Emergency Plan was revised to implement a standard fleet Emergency Response Organization for Calvert Cliffs, Nine Mile Point, and Ginna stations under Constellation Energy. This entailed changes to position titles, Minimum Staff positions, Minimum Staffing, changes to assigned tasks, and changes to implementing procedures to establish a mostly common ERO.

2.3.5 Exelon Nuclear Standardized Radiological Emergency Plan, Revision 26 – In April 2015, Ginna Emergency Plan was incorporated into the Exelon Fleet Standardized Emergency Plan under EP-AA-1000. This entailed changes to position titles, and changes to implementing procedures in an effort to establish a mostly common ERO throughout the Exelon Fleet.

2.4 Minimum Staffing and Full Augmentation as discussed in R. E. Ginna Nuclear Power Plant's Emergency Plan

The Ginna Emergency Plan designates two (2) types of augmented ERO responders. Those designated as Minimum Staff are those additional ERO personnel needed to relieve the on-shift staff of key EP functions/tasks required in response to the emergency. Those key functions and associated tasks are identified in NUREG-0654, Section II.B. Evaluation Criteria 5 of Section II.B of NUREG-0654, Revision 1, states in part:

> *Each licensee shall specify the positions or title and major tasks to be performed by the persons to be assigned to the functional areas of emergency activity. For emergency situations, specific assignments shall be made for all shifts and for plant staff members, both onsite and away from the site. These assignments shall cover the emergency functions in Table B-1 entitled, "Minimum On-Site Staffing Requirements for Nuclear Power Plant Emergencies." The minimum on-shift staffing levels shall be as indicated in Table B-1. The licensee must be able to augment on-shift capabilities within a short period after declaration of an emergency. This capability shall be as indicated in Table B-1.*

Those ERO positions designated as Minimum Staffing in the Ginna Emergency Plan are those required to activate their respective Emergency Response Facility (ERF). Specifically, these are the ERO positions that are the absolute minimum needed to implement the Emergency Plan (i.e., if any position or function is not staffed then the Emergency Plan may not be effectively implemented). These positions in most cases are required to respond to their respective ERF within 60 minutes of the declaration of an Alert or higher ECL.

> *…"Facility Activation" refers to the decision to consider a facility fully operational based on the minimum staffing required in ERO staffing tables contained within the station specific Annex and the ability of facility staffing and equipment to perform its designed function(s).*

The positions which are considered Full-Augmented Staff (i.e., Non-Minimum Staff) are those positions which provide support for the Minimum Staff in their response to the emergency. The Full-Augmented Staff are discussed in EP-AA-1012, as well as the Ginna EPIPs.

As described in the Ginna Emergency Plan, these Full-Augmentation positions consist of liaisons, coordinators, supervisors, 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 NRC's Alternative Guidance. The list of Full-Augmented positions and their current assigned tasks are listed in Attachment 1C.

2.5 <u>EOF Activation as discussed in the R. E. Ginna Nuclear Power Plant Emergency Plan</u>

The NRC's Alternative Guidance establishes that the EOF facility activate within 60 minutes of a Site Area Emergency (SAE) or greater ECL. Exelon has elected to activate the EOF within 60 minutes of an Alert or greater ECL. By establishing the EOF at the Alert level, certain EP functions such as Dose Assessment or State/local communications can be established immediately following the Alert classification at the EOF and need not be duplicated at the TSC.

The turnover of Command and Control of EP functions will occur through a conference line between the Main Control Room (MCR), TSC, and EOF and may occur simultaneously if all facilities are available. In this manner, there will be no delay in

transferring functions such as Emergency Action Level (EAL) classifications, State/local Notifications, Protective Action Recommendations (PARs), and Emergency Exposure Control from the MCR to the respective ERF (i.e., TSC or EOF).

2.6 ERO Performance Validation

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

In support of this effort, and as documented in Enclosure 2 of this submittal, Exelon makes the following commitment:

> Exelon will conduct a confirmation Emergency Preparedness Drill at one of the Exelon Stations 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 (Simulator), TSC, OSC, EOF and JIC).

This commitment shall be completed prior to the implementation of the approved license amendment.

In addition, Exelon will institute a "Minimum Staff" drill to be conducted once per drill cycle. This will allow Exelon to periodically demonstrate that the Standardized Emergency Plan continues to effectively implement the required Emergency Preparedness functions utilizing only the Minimum Staff defined in the Emergency Plan. Since the ERO Minimum Staff is the same for each station under the Exelon Standardized Emergency Plan, it is not necessary to perform the drill for each station in a drill cycle. The stations would select one station to demonstrate the effectiveness of the minimum staff ERO for the stations which share the EOF. Credit for the "Minimum Staff" drill will be given to all of the affected stations which share the EOF. In support of this effort, and as documented in Enclosure 2 of this submittal, Exelon makes the following commitment for each of it's stations:

> *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 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.*

2.7 On-Shift Staffing Analysis (OSA)

Regulatory Issue Summary (RIS) 2016-10, *"License Amendment Requests for Changes to Emergency Response Organization Staffing and Augmentation,"* states that an on-shift staffing analysis under 10 CFR 50, Appendix E, Section IV.A.9 should not be used to provide the primary basis to support the Technical Evaluation of a License Amendment Request (LAR). The OSA however may be utilized as part of the overall evaluation of staffing changes. The RIS states:

> *…an evaluation performed using only the guidance of NEI 10-05 does not satisfy the requirement to identify and evaluate changes to ERO augmentation timing or ERO augmentation staffing that reduces the capability to perform an emergency planning function.*

In conjunction with this License Amendment Request, Ginna performed an OSA per 10 CFR 50, Appendix E, Section IV.A.9. The results are used to support the conclusions made in this License Amendment Request for on-shift staffing; however, Exelon understands that the OSA comprises a select set of identified scenarios and should not be used as the sole basis for the conclusions in the technical evaluation supporting this amendment request.

3.0 TECHNICAL EVALUATION

The evaluation of the proposed changes is discussed below.

3.1 Technical Advancements and Support

The following section discusses technical changes in plant systems, procedures, EP equipment/programs and training, which have been completed to better support ERO functions, ease Operator burden, and improve Augmented Staff efficiency. The following discussion describes the improvements implemented since the last revision of the NUREG-0654 staffing guidance.

3.1.1 Plant Process Computer

The Plant Process Computer (PPC) system provides for the Safety Parameter Display System (SPDS) functions discussed below as well as data collection and processing, accounting, alarming, and logging functions. An auxiliary function of the PPC is to transmit plant data to remote locations, including the TSC and the EOF.

The PPC and the SPDS provide a concise display of critical plant variables to the Main Control Room (MCR) personnel to aid them in rapidly and reliably determining the safety status of the plant. The PPC and SPDS are operated during normal plant operations, as well as during abnormal and emergency conditions. Their principal purpose and function is to aid the MCR personnel during abnormal and emergency conditions in determining the safety status of the plant.

Parameters displayed by the PPC and SPDS are the quantitative and qualitative measures to indicate the accomplishment or maintenance of critical safety functions. Information needed to assess the status of the plant safety parameters is obtained by the measurement of key plant variables. The safety parameters utilized to assess the maintenance or accomplishment of the critical safety functions as required by NUREG-0737, Supplement 1, "Clarification of TMI Action Plan Requirements: Requirements for Emergency Response Capability," Section 4 are:

1. Reactivity control
2. Reactor core cooling and heat removal
3. Reactor coolant system integrity
4. Containment conditions
5. Radiation control

In general, the ranges of parameters monitored by the PPC and SPDS are identical to those ranges monitored by existing MCR instrumentation. Ranges displayed by the PPC/SPDS are adequate to cover plant responses analyzed in Updated Final Safety Analysis Report (UFSAR) Chapter 15, "Accident Analysis."

Benefits of the current level of computer capabilities include:

- Improved plant monitoring capability for emergency functions.
- Real-time plant data available through graphical displays.
- PPC functions available to any desktop computer throughout the plant's Emergency Response Facilities.
- Multiple graphical displays.

The PPC system replaced multiple older and obsolete systems with a single, microcomputer-based operating platform incorporating the PPC and the SPDS as well as the following:

- Process Computer System
- Meteorological Data Acquisition System
- Sequence of Events Recorder (SER)
- Radiation monitoring

By consolidating all of these systems onto a single platform, ERO personnel can quickly monitor all critical plant parameters from a single workstation. The following are some of the benefits of PPC:

- The Emergency Director has improved plant monitoring capability to support Emergency Director (ED) function.

- Data manipulation functions, such as plotting information graphically or recovering historical data, require fewer key strokes and are more easily performed.

- The SER function has become a "real-time" user tool by making data immediately available rather than being only available via printer after the event.

- Much of the PPC functionality can be made available to any desktop computer through the plant's site-wide intranet.

- The increased capabilities of PPC have enhanced timeliness of monitoring and assessing plant conditions.

Ginna also utilizes a Digital Plant Viewer (DPV) system that permits personnel to view conditions in the plant where cameras are installed live-time prior to entry. The DPV also allows personnel to access live-time dose rate data in areas with installed Area Radiation Monitors (ARM). No RP Technician support is required to use DPV.

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

3.1.2 Dose Assessment

Radiological dose assessment has benefited from technological advances that make its use simpler and less time consuming. At the time of the startup of Ginna, procedures describing methods for manually calculating offsite doses were provided.

In October 1991 (Ginna Emergency Plan, revision 10), a computer-based method for Dose Assessment was implemented using methods for environmental dose calculations required by Federal regulations. The system was a PC-based computer dose model and provided a means for immediate dose assessment.

In 2014, Unified Rascal Interface (URI), a Visual Basic.net program was implemented at the station. URI is a more efficient program utilizing menus and toolbars with the majority of inputs on a single screen making the program more user-friendly. The plant display systems have improved over the years allowing access to more data points that are needed within dose assessment. Redundant dose assessment computers were installed as part of the implementation of Cyber Security requirements. Ginna has an individual plant data screen dedicated to the needs of dose assessment inputs.

The overall improvements in technology and information availability over the years have enabled the on-shift staff to assess plant conditions quickly and efficiently, and with less distraction than before. The computing power of modern computer processors allow for calculation of dose projections in seconds rather than minutes.

3.1.3 Automated Call-Out Systems

Enhancements in automated call-out and paging systems have resulted in streamlined processes for activation of the ERO. The ERO activation can occur through a Web-

based or phone-based system to initiate rapid notification of ERO members in lieu of individual calls to fill the individual ERO positions included in the current Emergency Plan for Ginna. The system includes a primary activation system as well as back-up capability to ensure uninterrupted operation.

3.1.4 Procedural Improvements

a. Emergency Operating Procedures (EOPs)

Since the original Emergency Plan approval, EOPs have been improved through industry initiatives. EOPs generally use a symptom-based approach that demands less assessment and interpretation of plant conditions by the crew. In addition, the EOPs are better human factored, and have an improved layout allowing for more consistent implementation.

EOPs interface well with new technology such as the PPC. The PPC system is capable of graphically displaying plant conditions to assist in EOP execution.

Abnormal Operating Procedures (AOPs) also contain directional steps for when a review of the classification procedure is required to determine potential classifiable conditions. This prompts the user to identify applicable EALs.

b. Emergency Action Levels (EALs)

In 2018, Ginna updated the EAL classification methodology to that published in NEI 99-01, Revision 6, *"Development of Emergency Action Levels for Non-Passive Reactors."* The Ginna EALs incorporate guidance that has simplified the classification process, including the use of a matrix of EAL initiating conditions that streamlines the process of evaluating EAL against plant conditions.

3.1.5 Training

a. Operations Training

Training is used to strategically drive improved performance at Ginna. Since NRC approval of the Ginna Emergency Plan, the Systematic Approach to Training (SAT) has resulted in developing a task list for Operations personnel. The SAT process ensures training is conducted to industry-accepted standards and has led to accreditation of the Operations Training Programs by the Institute of Nuclear Power Operations (INPO) National Academy for Nuclear Training.

A dynamic simulator is routinely used during Operations training. "Out of the Box (ODE)" simulator evaluations that include emergency response scenarios are part of the requalification segment. Simulator scenarios are designed to be realistic and reflect a wide range of plant conditions, including emergency conditions. During the simulator evaluated sessions the MCR staff is taken from normal operations to accident conditions which require evaluation against Emergency Action Levels and may result in their declaration up to a General Emergency (GE). The Operations crew performs critical

functions, such as classification, core damage assessment, accident mitigation, response prioritization, and communications without augmentation from additional responders. The proficiency of the MCR staff to perform these functions while maintaining situational awareness, without additional support is assessed during evaluated simulator sessions.

The Licensed Operator Requalification Training (LORT) Program includes licensed Operations crew performance evaluations that are to consider the scenario guidance attributes of INPO Operations Department Standing Instruction, ODSI-3, *"Operations Department Guidance for Conducting Crew Performance Evaluations."*

INPO ODSI-3 provides guidance on the realistic integration of the emergency response into crew performance evaluations. The purpose is to ensure the additional challenges the Emergency Plan responsibilities add to the crew's ability to manage an event are realistically represented in the crew performance evaluations. Representing the event as realistically as possible, which includes the additional challenges of Emergency Plan responsibilities, helps promote the situational awareness necessary during a real event.

b. Shift Technical Advisor (STA) Training

The STA was originally trained as an advisor to the operating shift per NUREG-0737, *"Clarification of TMI Action Plan Requirements."* In 2014, additional guidelines were developed by INPO for the training of STAs. This is detailed in the document ACAD 14-002, *"Guidelines for the Training and Qualification of the Shift Technical Advisor."* The ACAD 14-002 guidelines describe the role of the STA. The STA performs independent assessments of plant operating concerns, technical support, appropriate corrective actions, analysis of events and their effects, effectiveness of response(s) to emergent conditions, classifications of emergencies, protection of the public, and any other actions related to critical safety functions and plant safety during abnormal and emergency situations. They also contribute to operations during normal plant conditions. By routine monitoring of equipment and plant operations, the STA can focus on preventative actions in order to mitigate the consequences of an accident.

3.1.6 Radiation Protection Improvements

There have been many improvements in RP since the Ginna staffing was established under NUREG-0654, Revision 1 guidance.

The following provides a summation of the technology/tools associated with the in-plant protective actions:

a. Access Control

- Access to the Radiologically Controlled Area (RCA) is controlled electronically. The electronic access control system provides for the user to electronically sign Radiation Work Permits (RWPs) to self-authorize themselves to access the RCA and self-issuance of an electronic dosimeter (in addition to the assigned Dosimetry of Legal Record (DLR) that is always worn). Access to the RCA is controlled electronically without interface with a RP Technician.

b. Personnel monitoring

- Personnel are issued DLRs that are continuously worn for constant monitoring. No RP Technician support is needed for issuance of DLRs to on-shift emergency workers.

- Secondary dosimeters are issued through the electronic access control system. The secondary dosimeters are self-reading, alarming electronic dosimeters that provide readout of accumulated dose and ambient dose rate. No RP Technician support is needed for issuance of electronic dosimeters.

- Automated whole-body monitors provide contamination monitoring. All radiation workers are qualified to use the automated whole-body monitors without RP Technician interface.

- In circumstances when the automated whole-body monitors are not available, handheld friskers are used for personnel contamination monitoring. All radiation workers are qualified to use the hand-held friskers without RP Technician interface.

c. Dosimetry

- Personnel are issued DLRs that are continuously worn for constant monitoring.

- Secondary dosimeters are self-issued through the electronic access control system. The secondary dosimeters are self-reading, alarming electronic dosimeters that provide readout of accumulated dose and ambient dose rate. No RP Technician support is needed for issuance of electronic dosimeters.

- If a DLR is lost or damaged under emergency conditions, additional DLRs are staged for emergency issuance.

- If an electronic dosimeter is lost or damaged, additional electronic dosimeters are available.

d. Area Radiation Monitors (ARMs) are also used and reviewed prior to dispatch of personnel into the plant. Ginna has multiple ARMs throughout the plant.

Some RP Technician support functions associated with in-plant protective actions such as access control, personnel monitoring, dose assessment, and dosimetry now require less dedicated support time since they are covered by plant process enhancements (newer technology/tools).

These technology/tools use available equipment such as portal monitors, self-alarming dosimeters, and an automated access control point.

All onsite ERO members expected to be dispatched into the plant for evaluation, operations, or repair activities are Radiation Worker qualified and are trained on how to use the available tools.

3.1.7 Improvements Summary

The improvements to staffing, equipment, procedures, and training that have occurred since initial approval of the Ginna Emergency Plan have resulted in a significant increase in on-shift capabilities and knowledge. Based on these improvements, it is concluded that there would be no significant degradation or loss of any functional task as a result of the proposed changes in ERO staffing.

3.2 Functional Analysis

This analysis evaluates the impact of implementing the changes in staffing on the ERO's ability to perform the major tasks for the major functional areas of the Ginna Emergency Plan. The analysis demonstrates that no degradation or loss of function would occur as a result of the change.

3.2.1 EP Function: Command and Control (formerly Emergency Direction and Control)
The Command and Control function includes the following tasks as defined in the NRC's Alternative Guidance:

- Provide overall ERO command and control, until relieved.
- Approve EAL and/ or Protective Action Recommendation (PAR) classifications, until relieved.
- Authorize personnel dose extensions, until relieved.

This function is important for effective emergency response because adequate Command and Control enables the Ginna ERO to effectively develop priorities for response planning and corrective action(s) and to provide a unified approach to the event response by providing a single individual with overall command and control authority. The function is staffed and maintained at all times and is assigned to the Operations Shift Manager (SM). The augmentation (relief) of this position is intended to relieve the SM of EP functions so that the SM can focus on the event response from an operations perspective. This is available within 60 minutes of an Alert ECL declaration, or greater and is a position staffed by the TSC Station ED. In addition, the EOF Corporate ED will take responsibility for those EP functions associated with PARs following activation of the EOF, also at the Alert or greater ECL.

a. On-Shift Staff – The table below identifies the current, proposed, and NRC's Alternative Guidance for this EP Function and proposed Emergency Plan ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Command and Control – On-shift		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
• (1) Shift Emergency Director	• Shift Emergency Director	• Operations Shift Manager

Emergency Plan Change Assessment

The Ginna existing on-shift staffing table currently aligns with the NRC's Alternative Guidance.

NRC's Alternative Guidance Alignment

Ginna will maintain the existing title for this EP Function. The Operations Shift Manager will be titled Shift Emergency Director at Ginna.

b. Minimum Staff – The table below identifies the current and proposed Emergency Plan ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Command and Control – Minimum Staff		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
• (1) TSC Station Emergency Director • (1) EOF Corporate Emergency Director	• (1) TSC Station Emergency Director • (1) EOF Corporate Emergency Director (at Alert or higher)	• (1) TSC Emergency Coordinator (at Alert or higher) • (1) EOF Emergency Director (at SAE or higher)

The proposed ERO staffing is consistent with the NRC's Alternative Guidance. There is one difference between the Ginna proposed Minimum Staff and the NRC's Alternative Guidance. Specifically, Ginna will staff the EOF Corporate ED within 60 minutes of an Alert or higher ECL, while the NUREG-0654 guidance staffs the position within 60 minutes of a SAE or higher ECL. This difference expands the Ginna emergency response at the Alert ECL and will ensure that the EOF ERO will be immediately available should an Alert classification escalate to a SAE or GE ECL. Ginna will maintain their existing titles for this EP Functions.

3.2.2 EP Function: Communications

The Communications function includes the following tasks as defined in the NRC's Alternative Guidance:

- Communicate EAL and PAR classifications to Offsite Response Organizations (OROs), including the NRC, until relieved.

This function is important for effective emergency response. The function ensures adequate communication onsite and offsite to successfully implement the emergency plans. Ginna maintains the ability to staff this position at all times. This function is assigned to a pre-existing on-shift staff member as a collateral duty and has been assessed through an on-shift staffing analysis, via 10 CFR 50, Appendix E, Section IV.A.9, to ensure that this EP Function can be performed when needed without any additional competing priorities.

The augmentation of this position is available within 60 minutes of an Alert ECL, or greater, and is intended to relieve the on-shift staff of this EP function. This function consists of two (2) ERO members to fulfill the communication needs (i.e., one (1) for the NRC and one (1) for State/local notification and status updates). Under the Ginna Emergency Plan, additional Communicators can be called upon as needed, and at the discretion of the ED.

a. On-Shift Staff – The table below identifies the current and proposed Emergency Plan On-shift ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Communications – On-shift		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
• (1) Shift Communicator	• (1) Shift Communicator	• (1) Communicator[1] [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.

Emergency Plan Change Assessment

There are no changes between the current Ginna Station Emergency Plan staffing and the proposed changes to the Emergency Plan for the On-shift Communications function.

NRC's Alternative Guidance Alignment

Ginna will keep the Shift Communication function consistent with the NRC's Alternative Guidance. The Shift Communicator will perform NRC and State/local communications as needed until relieved.

A difference identified related to the Ginna implementation of the NRC's Alternative Guidance is the absence of the note (1) regarding collateral duties. The note states: *"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,"* and is not included in the Ginna Emergency Plan. This note is not necessary because no collateral duties are assigned to the on-shift Communicator under the Ginna Emergency Plan.

There are no other deviations from the NRC's Alternative Guidance.

b. Minimum Staff – The table below identifies the current and proposed Emergency Plan ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Communications – Minimum Staff		
Current Emergency Plan, Ginna Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
• (1) TSC ENS Communicator • (1) EOF State/local communicator • (1) TSC Director • (1) EOF Director	• (1) TSC ENS Communicator • (1) EOF State/local Communicator (additional Communicators will be staffed as needed)	• (1) TSC Communicator (NRC) • (1) TSC Communicator (ORO) • (1) EOF Communicator at SAE ECL or greater As needed (one communicator staffed at TSC for NRC communications if needed)

Emergency Plan Change Assessment

Ginna is maintaining the Minimum Staff TSC ENS and EOF State/local Communicator as currently described in the Ginna Emergency Plan with no proposed changes to those positions. Additional Communicators will be staffed at the EOF or TSC as needed.

The following positions, identified as minimum staff under the current Ginna Emergency Plan, are being re-categorized as Full-Augmented staff and will continue to be managed within an EPIP.

TSC Director – The TSC Director is identified as Minimum Staff in the EP-AA-1012, Figure 2-1, Minimum On-Site Staffing Requirements. The TSC Director is reclassified as Full Augmentation. Under the Ginna Emergency Plan, the TSC Director does not directly perform actions necessary to accomplish EP functions under NUREG-0654, but rather support other personnel at the TSC. The position would not be considered as part of the absolute minimum ERO 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). The TSC Director performs support activities such as supervisory actions, validations, liaison, assistance and monitoring activities. Specific responsibilities include:

- *Activate the Facility. [reassigned to Station Emergency Director]*
- *Establish and maintain facility accountability.*
- *Manage the operation of the facility.*
- *Review and ensure facility displays are maintained current.*
- *Coordinate ERO shift relief rosters for the on-site facilities.*
- *Develop ERO shift relief rosters for the facility.*
- *Coordinate integration of the NRC Site Team.*
- *Arrange for logistics support.*
- *Ensure flow of information within and between the emergency response facilities.*
- *Provide input for facility briefs.*
- *Coordinate TSC relocation.*

With the exception of Facility activation, these tasks above are considered support activities and are not required to directly accomplish any of the NUREG-0654 identified functions. Tasks to activate the facility will be assigned to the Station Emergency Director. As such, the TSC Director position can be deleted from the Minimum Staff and maintained as a Full- Augmentation position. The TSC Director position and the listed responsibilities are being relocated to an EPIP.

EOF Director – The EOF Director is identified as Minimum Staff in the EP-AA-1012, Figure 2-1, Minimum On-Site Staffing Requirements. The EOF Director is reclassified as Full Augmentation. Under the Ginna Emergency Plan, the EOF Director does not directly accomplish EP functions under NUREG-0654, but rather support other personnel at the EOF. The position, as currently described in the Ginna Emergency Plan, would not be considered as part of the absolute minimum ERO 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). The EOF Director performs support activities such as coordination, assessment, monitoring, and assistance activities. Specific responsibilities include:

- *Activate the Facility. [reassigned to Corporate Emergency Director]*
- *Manage the operation of the facility.*
- *Coordinate for continual shift staffing requirements as needed.*
- *Coordinate integration of the NRC site team.*
- *Prepare State/Local notification forms and obtain Corporate ED approval to support the completion of timely offsite event notifications.*
- *Participate in the Inter-Facility briefing to communicate and obtain event and response information.*
- *Provide input for facility briefs.*

With the exception of Facility activation, these tasks above are considered support activities and are not required to directly accomplish any of the NRC's Alternative Guidance identified functions. Tasks to activate the facility will be assigned to the Corporate Emergency Director. As such, the EOF Director position can be deleted from the Minimum Staff and maintained as a Full Augmentation position. The EOF Director position and the listed responsibilities are being relocated to an EPIP.

NRC's Alternative Guidance Alignment

Ginna will maintain the ENS (NRC) Communicator and State/local (ORO) Communicators consistent with the NRC's Alternative Guidance; however, the reporting location differs. Specifically, the function is maintained with one (1) ENS Communicator staffed at the TSC within 60 minutes to perform NRC communications and one (1) State/local Communicator at the EOF within 60 minutes to perform the State/local notifications with the OROs.

The NRC's Alternative Guidance designates the minimum staff ORO communication (State/local) is located at the TSC. For Ginna, the State/local Communicator is located in the EOF. This is considered acceptable because the Ginna EOF is activated at the Alert or higher ECL. By establishing the EOF at the Alert level, the function would be available at the same time as if it were located in the TSC.

Additionally, the NRC's Alternative Guidance, identified an EOF NRC communicator to be staffed within 60 minutes of an SAE or higher ECL. Exelon proposes to credit the TSC ENS communicator to provide information to the NRC in conjunction with the commitment to staff additional communicators as needed.

3.2.3 EP Function: Radiation Protection (formerly Radiological Assessment / In Plant Protective Actions)

The RP function includes the following tasks as defined in NRC's Alternative Guidance:

- 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.

The ability to provide radiological expertise when the plant is experiencing an event with serious radiological consequences is crucial, due to the unknown radiological environment faced by emergency workers, particularly at the onset of the event.

This function is to be staffed by two (2) qualified RP staff members on-shift per the Guidance. Under the NRC's Alternative Guidance, the augmentation (support) of this position occurs in two (2) stages: 1) within 60 minutes of an Alert ECL or greater, three (3) additional qualified RP staff are available; and 2) within 90 minutes of an Alert ECL, or greater, an additional three (3) qualified RP staff are available, and both are staffed in the OSC.

The *"Technical Analysis in Support of the Guidance in NUREG-0654/FEMA-REP-1, SECTION II.B, Emergency Response Organization,"* for proposed Revision 2 states that: "*based upon staff review and approval of ERO staffing plans, and the evaluation of licensee exercises, the [NRC] staff has determined that expecting 2 qualified RP staff on-shift is reasonable for the increased time period (30 minutes to 60 minutes), at which point additional RP resources would become available, and that 3 additional RP staff in 60 minutes and 3 additional RP staff in 90 minutes is acceptable to ensure the staff can maintain its reasonable assurance finding (10 CFR 50.47(a)). In addition, the [NRC] staff has determined that field monitoring teams (FMTs) (onsite and offsite) can function with limited RP expertise while under the direct supervision of senior RP staff in the TSC or EOF, thus removing the need for a fully qualified RP staff member being a part of the FMT when their expertise is better suited supporting the ERO on-site.*" The EOF RP Manager supervising the FMTs at Ginna is responsible for directing the FMTs as well as providing direction for their safety from the radiological event.

In addition, the Chemistry/Radiochemistry function listed in Table B-1 to Revision 1 of NUREG-0654, is no longer needed as the need for immediate reactor coolant sampling has been reduced due to the variety of plant indications of fuel damage available at Ginna.

Overall, the ERO functions assigned to qualified RP staff are more clearly defined in Table B-1 to the NRC's Alternative Guidance.

a. On-Shift Staff – The table below identifies the current and proposed Emergency Plan On-Shift ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Radiation Protection – On-shift		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
• (2) Shift RP Technician • (1) Shift Chemistry Technician	• (2) Radiation Protection Personnel	• (2) Radiation Protection Personnel

Emergency Plan Change Assessment

Ginna will maintain two (2) qualified RP staff members on-shift for this function. The proposed revision removes the Chemistry reference from Figure 2-1. The Chemistry/Radiochemistry function listed in Table B-1 to Revision 1 of NUREG-0654, is no longer needed as the need for immediate reactor coolant sampling has been reduced due to the variety of available plant indications of fuel damage available at Ginna. Early indications of fuel damage can be identified through Containment Radiation Monitors, Core Instrumentation, or Effluent Radiation Monitors, all of which are available in the MCR.

An on-shift staffing analysis under 10 CFR 50, Appendix E, Section IV.A.9 was performed to ensure that the Chemistry major task is not required per Ginna procedures prior to augmentation. The OSA indicates that the primary responsibility of the on-shift Chemistry Technician is chemistry/radiochemistry sampling to identify fuel damage; however, no chemistry sampling tasks were noted as being time critical in any of the analyzed events.

NRC's Alternative Guidance Alignment

The proposed ERO staffing is consistent with the NRC's Alternative Guidance. The assigned major tasks are aligned with those stated in the NRC's Alternative Guidance. Ginna will maintain two (2) RP personnel on-shift to perform the RP functions and tasks for protection coverage for responders, in-plant surveys, dosimetry and radiologically controlled area access. There are no differences or deviations from the NRC's Alternative Guidance.

b. Minimum Staff – The table below identifies the current and proposed Emergency Plan ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Radiation Protection – Minimum Staff		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
• (1) RP Technician (In-Plant Surveys) • (3) RP Technicians (Radiation Protection) • (1) Chemistry Technician	• (3) Additional RP Personnel @ 60 minutes (OSC) • (3) Additional RP Personnel @ 90 minutes (OSC)[6] Note 6: Ginna Only -Two of the RP Personnel who respond at 90 minutes may be survey task qualified and not require ANSI qualifications.	• Additional Radiation Protection Technicians @ 60 minutes (In addition to personnel on-shift) (3) (OSC) • Additional Radiation Protection Technicians @ 90 minutes (In addition to personnel on-shift and those responding within 60 min) (3) (OSC)

Emergency Plan Change Assessment

Currently, Ginna designates three (3) Minimum Staff RP Personnel as required to support the EP Major Tasks of In-Plant Surveys and Radiation Protection at 60 minutes. Ginna proposes to staff 3 RP Personnel at 60 minutes and 1 RP Personnel at 90 minutes and 2 additional Task Qualified ERO responders at 90 minutes.

Note for the purposes of this table, except as discussed below, RP Personnel consists of persons with an ANSI qualification. This includes RP Technicians or qualified RP Staff members. This is consistent with the guidance provided in the NRC's Technical Basis for the Proposed Guidance in NUREG-0654/FEMA-REP-1, Section II.B, "Emergency Response Organization". The two additional Task Qualified personnel will be under the direction and supervision of an RP Lead Technician.

For Ginna, a Note 6 has been added to the Table 5-1 of the Standardized Emergency Plan. Note 6 explains that two (2) of the 90-minute RP personnel responders will be task-qualified, i.e., qualified to assess radiation and contamination levels, but will not necessarily be an ANSI-qualified RP Technician. The task qualified individuals would be available to support and work under the director of qualified ANSI RP Personnel. This is acceptable considering the following circumstances which are applicable to Ginna.

- The task qualified individuals responding at 90 minutes will be under the direct supervision of RP Supervisor or Lead and be supported by 6 other ANSI qualified RP Personnel.
- Ginna is a single unit power plant that is one of the smallest in the Exelon fleet (580 MW).

- Ginna is a Pressurized Water Reactor, which contains a closed loop system in which the reactor coolant never leaves the containment vessel. A PWR has significantly less radiologically controlled square footage to manage compared to a similarly sized BWR. For example, the James A. Fitzpatrick plant is an 838 MWe BWR and has a primary radiologically controlled area footprint approximately 4 times the size of Ginna.
- Ginna, as a single unit, two-loop Westinghouse PWR, is also much smaller than most PWR sites. The footprint of the Ginna primary RCA is approximately one third that of the Calvert Cliffs NPP (a relatively compact 1700 MWe two-unit site) and CCNPP also contains 4 floor elevations of equipment and components compared to three floor elevations at Ginna. The total RCA area at CCNPP is approximately four times that at Ginna.
- The Digital Plant Viewer, developed by Exelon Generation's innovation group, is an intuitive web-based mapping interface that accesses radiological surveys, live video feeds, and 360-degree images. Nuclear employees already use a vast array of mapping, telemetry, and other data systems to run the plant daily, but the Digital Plant Viewer pulls the technological systems together in one place for the first time.

  DPV is a portal technology that provides live video, temperature, and up-to-date radiation dose information throughout the plant. DPV is accessible through the Exelon Intranet, including access through PCs, mobile devices, and touch screens. The DPV facilitates pre-job planning, briefings, field work, training, observations, trending, troubleshooting, and more.

  Time savings and efficiency are realized in the RP function area through:

  - More efficient pre-job briefing and job coverage.
    - DPV provides unfamiliar workers with optimum path to work location
    - DPV provides identification of interferences prior work start
    - DPV allows for reduction of traffic / hold up at Rad Pro desk for briefings
    - DPV allows for verification of pre-requisite work tasks can be completed prior to entering plant
- Current viewing locations are included throughout the plant. In addition to the touch screen monitors, DPV is also accessible via PCs and mobile devices. Ginna's Protected Area and Owner Controlled Area footprint is small in comparison to other sites in the industry. Ginna Station is located directly on the south shore of Lake Ontario which bounds the area around the station.

- Ginna station is located approximately 64 miles drive from Exelon's Nine Mile Point and FitzPatrick Nuclear Stations. Both stations are within a 90-minute drive and have RP Technicians trained and qualified in the Exelon programs and processes enacted at Ginna. These RP Technicians regularly support Ginna during Outages and are familiar with the station. These technicians would be made available to Ginna, if needed, under Emergency Conditions.

In addition, Technological advances in RP tasks (i.e., protection coverage for responders, in-plant surveys, dosimetry and radiologically controlled area access) support the additional time proposed in the NRC's Alternative Guidance for the three (3) RPTs. This includes the availability of installed area, process, airborne and effluent radiation monitors, automated systems and information technology solutions supporting RWPs and dosimetry issuance, and enhanced work processes that are available under accident conditions. Supporting tools and processes include portal monitors, self-alarming dosimeters, and the automated access control system for the RCA that maintain active RWPs (e.g., the system verifies qualifications, dose margins, and access requirements).

Considering the above, Ginna proposes to staff 3 RP Personnel at 60 minutes and 1 RP Personnel at 90 minutes and 2 additional Task Qualified ERO responders at 90 minutes. The ERO responders for the RP Function provide for the necessary response under the Emergency Plan.

The proposed revision also removes the one (1) Minimum Staff Chemistry personnel from Figure 2-1. The Chemistry/Radiochemistry function listed in Table B-1 to Revision 1 of NUREG-0654, is no longer needed as the need for immediate reactor coolant sampling has been reduced due to the variety of available plant indications of fuel damage available at Ginna. Early indications of fuel damage can be identified through Containment Radiation Monitors, Core Instrumentation, or Effluent Radiation Monitors, all of which are available in the MCR. If reactor sampling is desired, Chemistry Technicians are on staff at Ginna and would be called in as necessary to support the event.

NUREG-0654, Revision 2 Alignment

Ginna proposes to staff 3 RP Personnel at 60 minutes and 1 RP Personnel at 90 minutes and 2 additional Task Qualified ERO responders at 90 minutes. As discussed above, the ERO responders for the RP Function described in the Ginna Emergency Plan provide for the acceptable response to emergency conditions.

3.2.4 EP Function: Supervision of Radiation Protection Staff and Site Radiation Protection

Supervision of RP staff and Site RP Functions include the following tasks as defined in the NRC's Alternative Guidance:

- 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.

This function is important for effective emergency response to a radiological event because the management of RP resources, and the assistance this position provides the ED, is crucial for response to radiological events.

Radiological events can be very significant and constantly evolving, and require significant expertise in radiation and radiological consequences. The evaluation of radiological events, and the development of effective PARs, requires this expertise to support the ED in making these decisions.

This position is also responsible for the direction and protection of FMTs.

The augmentation of this function is available within 60 minutes of an Alert ECL, or greater, and is staffed in the TSC. Also for Ginna, at the Alert ECL or greater, an EOF RP Manager position is staffed. Note that this position is primarily tasked with providing the applicable command and control position (i.e., Corporate ED) relevant expertise on radiological events. This will increase the Ginna emergency response at the Alert ECL and will ensure EOF ERO will be immediately available should an Alert classification escalate to a SAE or GE.

a. On-Shift Staff – The table below identifies the current and proposed Ginna Emergency Plan On-Shift ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Supervision of Radiation Protection Staff and Site Radiation Protection – On-shift		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
• None	• Shift Emergency Director	• Operations Shift Manager

Emergency Plan Change Assessment

The current Ginna Emergency Plan does not specifically identify this Function on-shift under Figure 2-1. To align with the NRC's Alternative Guidance, the Function is

being added and assigned to the Shift ED. The tasks identified above align with current responsibilities for the Shift ED. An OSA under 10 CFR 50, Appendix E, Section IV.A.9 was performed to ensure that the major tasks under this Function identified above can be performed when needed without any additional competing priorities.

NRC's Alternative Guidance Alignment

Ginna will utilize the Shift ED on-shift to perform the *"Supervision of Radiation Protection Staff"* function until relieved by the Augmented Staff. There are no differences or deviations from the NRC's Alternative Guidance. The proposed ERO staffing is consistent with the NRC's Alternative Guidance. The assigned major tasks are aligned with those stated in the NRC's Alternative Guidance.

b. Minimum Staff – The table below identifies the current and proposed Ginna Emergency Plan ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Supervision of Radiation Protection Staff and Site Radiation Protection – Minimum Staff		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
• (1) TSC Radiation Protection Manager • (1) EOF Radiation Protection Manager	• (1) TSC Radiation Protection Manager • (1) EOF Radiation Protection Manager	• (1) TSC Site Radiation Protection Coordinator • (1) EOF Radiation Protection Manager @ SAE ECL or greater

Emergency Plan Change Assessment

Ginna will staff both the TSC RP Manager and the EOF RP Manager at 60 minutes from an Alert ECL consistent with current Emergency Plan commitments. There are no changes proposed to the current Emergency Plan for this Function.

NRC's Alternative Guidance Alignment

The TSC RP Manager will perform site related duties which include actions to recommend onsite protective actions, to direct all radiation protection activities at the site, and to evaluate and assess plant radiological data in the development of onsite protective actions. The TSC RP Manager will also provide relevant information to applicable communicators who are communicating offsite PARs to OROs.

The EOF RP Manager will perform duties which include actions to support evaluation of offsite radiological data in the development of onsite protective actions and offsite PARs, and to direct FMTs at the Alert ECL, or greater.

Ginna staffing of this Function is different than the NRC's Alternative Guidance, in that Ginna staffs both the TSC RP Manager and the EOF RP Manager at 60 minutes from an Alert ECL. The NRC's Alternative Guidance does not staff the EOF RP Manager until the SAE declaration.

This will increase the Ginna emergency response at the Alert ECL and will ensure that the EOF RP Manager will be immediately available should an Alert classification escalate to a SAE or GE ECL.

The proposed ERO staffing activates the EOF earlier than the NRC's Alternative Guidance. The assigned major tasks are aligned with those stated in the NRC's Alternative Guidance.

3.2.5 EP Function: Dose Assessments/Projections

The Dose Assessments/ Projections function includes the following tasks as defined in the NRC's Alternative Guidance:

- Perform dose assessments/projections and provide input to applicable PAR decision-maker, until relieved.

This function is important for effective emergency response to a radiological event because timely dose assessments/projections ensure accurate and timely PARs can be developed, when necessary. Ginna maintains the ability to staff this position at all times. This function is assigned to a pre-existing on-shift staff member as a collateral duty. An OSA under 10 CFR 50, Appendix E, Section IV.A.9 was performed to ensure that this EP function can be performed when needed without any additional competing priorities.

The augmentation of this function is available within 60 minutes of an Alert ECL, or greater, and is staffed in the EOF.

Maintaining the ability to perform dose assessments/projections at all times ensures that the consequences of a radiological event, to the public, are effectively mitigated by providing timely dose related information to the Station ED (TSC) or Corporate ED (EOF) depending on which position is in command and control. As a result, this position (Function) is expected to be available on-shift and in the EOF depending on the ECL declared.

a. On-Shift Staff – The table below identifies the current and Ginna Emergency Plan on-shift ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Dose Assessments/Projections – On-shift Staff		
Current Emergency Plan Requirement	Proposed Emergency Plan Table	NRC's Alternative Guidance
(Performed as a collateral duty by the Shift Chemistry Technician)	• Shift Dose Assessor [1] [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.	• Dose Assessment / Projections Staff [1] [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

Emergency Plan Change Assessment

The Shift Dose Assessment Function is annotated as being performed by the on shift Chemistry Technician as a collateral duty. in Ginna EP-AA-1012, Figure 2-1, Minimum On-Site Staffing Requirements. Ginna utilizes on-shift Chemistry Technician to perform the Dose Assessment Function prior to augmentation of the ERO. The Ginna Emergency Plan will be revised to annotate the Dose Assessment Function as the collateral duty and annotated with note (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."* The use of the on-shift RP Technician to perform Dose Assessment is assessed through an on-shift staffing analysis, via 10 CFR 50, Appendix E, Section IV.A.9, to ensure that this EP Function can be performed when needed without any additional competing priorities.

NRC's Alternative Guidance Alignment

Ginna will maintain a Shift Dose Assessor on-shift to perform dose assessments/projections and provide input to applicable PAR decision-maker functions. This function is performed by available qualified personnel (e.g., the on-shift RP Technician). Additionally, an on-shift staffing analysis under 10 CFR 50, Appendix E, Section IV.A.9 was performed to ensure that the Dose Assessment function on shift can be performed by one of the two (2) RP staff on shift without any additional competing priorities. The proposed ERO staffing for this Function is consistent with the NRC's Alternative Guidance. The assigned major tasks are aligned with those stated in the NRC's Alternative Guidance.

b. Minimum Staff – The table below identifies the current and proposed Ginna Emergency Plan ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Dose Assessments/Projections – Minimum Staff		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
Note 8 - Minimum Staff Dose Assessment will be performed by the RPM at the TSC and the RPM at the EOF as collateral duties.	• (1) EOF Dose Assessment Coordinator	• TSC (1) Dose Assessment/ Projection Staff • EOF (1) Dose Assessment / Projection Staff @ SAE or greater

Emergency Plan Change Assessment

The Minimum Staff Dose Assessment Function is annotated as performed by the RPM at the TSC and the RPM at the EOF as collateral duties. in Ginna's EP-AA-1012, Figure 2-1, Minimum On-Site Staffing Requirements. Ginna utilizes the RPMs to perform the Dose Assessment Function as a collateral duty prior to arrival of the Full Augmentation Dose Assessors. The proposed revision to the Ginna Emergency Plan adds the position of EOF Dose Assessment Coordinator as a dedicated Minimum Staff position to perform off-site dose assessments. The Dose Assessment Coordinator will be activated within 60 minutes of an Alert ECL or greater. The Dose Assessment Coordinator will report to the EOF RPM.

The following positions, identified as minimum staff under the current Ginna Emergency Plan, are being re-categorized as Full-Augmented staff and will continue to be managed within an EPIP.

EOF Environmental Coordinator – The EOF Environmental Coordinator is identified as Minimum Staff in the EP-AA-1012, Figure 2-1, Minimum On-Site Staffing Requirements. The EOF Environmental Coordinator is reclassified as Full Augmentation. Under the Ginna Emergency Plan, the EOF Environmental Coordinator responsibilities generally do not directly perform actions necessary to accomplish EP functions under NUREG-0654, but rather support other personnel at the EOF. Responsibilities required to be performed by Minimum Staff positions are transferred to other Minimum Staff positions. As such, the position would not be considered as part of the absolute minimum ERO 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). The EOF Environmental Coordinator performs support activities such as supervisory actions, validations, liaison, assistance and monitoring activities. Specific responsibilities include:

- *Direct and track Offsite Monitoring Team (OMT) activities.*
- *Coordinate activities with the external agency field monitoring teams.*

- *Establish and maintain OMT communications.*
- *Maintain and update the radiological status displays.*
- *Coordinate the receipt, analysis, storage and transfer of field monitoring samples.*
- *Record and report field monitoring survey, sample and exposure information.*

With the exception of the OMT coordination responsibility, these tasks above are considered support activities and are not required to directly accomplish any of the NUREG-0654 identified functions. Tasks to direct and track the Field Monitoring Team activities will be assigned to the EOF RPM (Put in EPLAn). As such, the EOF Environmental Coordinator position can be deleted from the Minimum Staff and maintained as a Full- Augmentation position. The EOF Environmental Coordinator position and the listed responsibilities are being relocated to an EPIP.

NRC's Alternative Guidance Alignment

The Ginna proposed ERO staffing for the Dose Assessment Function is different than that in the NRC's Alternative Guidance. Specifically, the NRC's Alternative Guidance provides for one (1) Dose Assessment position to be staffed at the TSC within 60 minutes of an Alert ECL or higher. A second Dose Assessor is staffed at the EOF within 60 minutes of an SAE ECL or higher. Ginna proposes to staff one (1) EOF Dose Assessor at 60 minutes from an Alert ECL or higher.

The NRC's Alternative Guidance was developed based on the premise that TSC is activated at the Alert ECL or higher and the EOF is activated at the SAE ECL or higher. While the Dose Assessment function falls more in line with the EOF responsibilities, it is not activated within the NRC's Alternative Guidance until a SAE ECL or higher. In order to provide early relief of the on-shift Dose Assessment function for Alert ECLs, the guidance provides a TSC Dose Assessor, which is available at the Alert ECL.

The Ginna EOF is staffed within 60 minutes of an Alert ECL or higher, making it unnecessary to staff the redundant TSC Dose Assessor. The EOF Dose Assessor Coordinator will perform duties which include actions to perform dose assessments/projections and provide input to applicable PAR decision-maker at the Alert ECL, or greater.

3.2.6 EP Function: Emergency Classifications

The Emergency Classifications Function includes the following task as defined in the NRC's Alternative Guidance:

- Evaluate plant conditions and recommend emergency classifications, until relieved.

This function is important to ensure a prompt and effective emergency response. Because the impetus for implementing the Emergency Plan is the determination of an

EAL at the correct ECL, having this ability maintained at all times is essential. This function is assigned to a pre-existing on-shift staff member as a collateral duty. An OSA under 10 CFR 50, Appendix E, Section IV.A.9 was performed to ensure that this EP function is performed when needed without any additional competing priorities. The augmentation of this function is available within 60 minutes of an Alert ECL, or greater, and is staffed in the TSC.

Maintaining the ability to perform this function at all times ensures that ECL decisions, and as applicable, the PAR decisions, are timely and accurate as these decisions have a direct relationship to public health and safety from the consequences of a radiological event. This function works in coordination with the ED in command and control, and as a result is available on-shift and in the TSC.

a. On-Shift Staff – The table below identifies the current and proposed Ginna Emergency Plan On-Shift ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Emergency Classifications – On-shift Staff		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
• None specified	• (1) Emergency Classification Advisor 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.	• (1) Emergency Classification Advisor 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.

Emergency Plan Change Assessment

The Ginna Emergency Plan Table 2-1 does not currently specify a separate Emergency Classification Function for the On-shift Staff. Ginna proposes to revise Emergency Plan EP-AA-1000, Figure 5-1 to align with the NRC's Alternative Guidance. This function is assigned to a pre-existing on-shift staff member as a collateral duty (e.g., STA). The STA has the experience and training to fill this position and the responsibilities for monitoring plant operation are consistent with the EP position responsibilities. The STA is trained in EAL classification and is available in the MCR to evaluate plant conditions and recommend emergency classifications as described in the NRC's Alternative Guidance.

The STA's responsibilities are defined in Operations Procedure OP-AA-101-111, Roles and Responsibilities of On-Shift Personnel. The procedure states the STA maintains a sufficient level of independence commensurate with station conditions to act as an advisor to the Shift Manager during abnormal and emergency conditions. During abnormal and emergency conditions the procedure states the STA is responsible to perform an independent assessment and diagnosis of station conditions and provides recommendations to the operating team. This assessment shall include monitoring critical parameters and challenges to radioactive release barriers. The STA is also responsible to perform an independent assessment of Emergency Plan classification (as time permits) and should not cause a delay in making the event classification within the required time limit.

This practice has been demonstrated and evaluated in Operations Training Program and EP Drills and Exercises. Additionally, the STAs role as an Emergency Classification Advisor is assessed in the OSA under 10 CFR 50, Appendix E, Section IV.A.9.

NRC's Alternative Guidance Alignment

Ginna will maintain an Emergency Classification Advisor on-shift to evaluate plant conditions and recommend emergency classifications. There are no differences or deviations from the NRC's Alternative Guidance.

b. Minimum Staff – The table below identifies the current and proposed Ginna Emergency Plan ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Emergency Classifications – Minimum Staff		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
• None specified	• TSC (1) Operations Manager (Emergency Classification Advisor)	• TSC (1) Emergency Classification Advisor

Emergency Plan Change Assessment

The current Ginna Emergency Plan does not specifically identify a Classification Advisor on Figure 2-1. Ginna proposes to utilize the Operations Manager to support EAL Classification. Ginna proposes to revise the Emergency Plan Figure 2-1 to include the Emergency Classification Function and assign the TSC Operations Manager to support and advise the non-delegable responsibility of EAL Classification. The Operations Manager under the Emergency Plan has the necessary background, experience and training to fill this position.

NRC's Alternative Guidance Alignment

Ginna will staff a TSC Operations Manager at 60 minutes to evaluate plant conditions and recommend emergency classifications. The proposed ERO staffing is consistent with the NRC's Alternative Guidance. The assigned major tasks are aligned with those stated in the NRC's Alternative Guidance.

3.2.7 EP Function: Engineering

The Engineering function includes the following tasks as defined in the NRC's Alternative Guidance:

- Provide engineering coverage related to the specific discipline of the assigned engineer, until relieved. Specifically:
    - An engineer to monitor and evaluate changing core/thermal hydraulic issues is important to effective emergency response because monitoring and evaluating core conditions, or thermal hydraulic conditions of the reactor coolant system, can support timely corrective action(s), ECL declarations, and subsequent PARs. Radiological events from a power reactor come from damage to an operating reactor core, or the systems used to cool the core, and engineering expertise in this area can greatly benefit the licensee's response.

      This function is assigned to a pre-existing on-shift staff member as a collateral duty. An OSA under 10 CFR 50, Appendix E, Section IV.A.9 was performed to ensure that this EP function is performed when needed without any additional competing priorities. The augmentation of this function is available within 60 minutes of an Alert ECL or greater, and is staffed in the TSC.
    - An engineer to provide expertise in Electrical/ I&C systems and equipment supports the evaluation of these systems/equipment and supports the development of repair plans if necessary. The augmentation (support) of this function is available within 60-minutes of an Alert ECL, or greater, and is staffed in the TSC.
    - An engineer to provide expertise in mechanical systems and equipment supports the evaluation of these systems/equipment and supports the development of repair plans if necessary. The augmentation (support) of this function is available within 60-minutes of an Alert ECL, or greater, and is staffed in the TSC.

a. On-Shift Staff – The table below identifies the current and proposed Ginna Emergency Plan On-Shift ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Engineering – On-shift Staff		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
• (1) STA	• (1) STA 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.	• (1) Core/Thermal Hydraulics Engineer 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.

Emergency Plan Change Assessment

The current Ginna Emergency Plan utilizes the STA to satisfy the on-shift responsibilities for the Plant System Engineering, Repair, and Corrective Actions Function (Major Tasks: Technical Support/Accident Analysis).

Under the NRC's Alternative Guidance, the EP Engineering function is included as an on-shift function. The Ginna Emergency Plan would be revised to identify the Engineering Function is a collateral duty satisfied by the STA on-shift. Under Ginna's procedure OP-AA-101-111, Roles and Responsibilities of On-Shift Personnel, the STA is responsible to perform an independent assessment and diagnosis of station conditions and provides recommendations to the operating team. This assessment shall include monitoring critical parameters and challenges to radioactive release barriers. The STA is also responsible to monitor Critical Safety Function Status per the EOPs.

NRC's Alternative Guidance Alignment

Ginna will maintain STA on-shift to perform the Core/Thermal Hydraulics Engineer function as a collateral duty. There are no differences or deviations from the NRC's Alternative Guidance and the proposed changes to the Ginna Emergency Plan.

b. Minimum Staff – The table below identifies the current and proposed Ginna Emergency Plan ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Engineering – Minimum Staff		
Current Emergency Plan Requirement	Proposed Emergency Plan Table	NRC's Alternative Guidance
• (1) Core Thermal/Hydraulic Engineer • (1) Mechanical Engineer • (1) Electrical Engineer • (1) EOF Technical Advisor • (1) TSC Operations Manager • (1) TSC Technical Manager	• (1) Core / Thermal Hydraulics Engineer • (1) Mechanical Engineer • (1) Electrical / Instrumentation & Controls Engineer	• (1) Core / Thermal Hydraulic Engineer • (1) Mechanical Engineer • (1) Electrical / Instrumentation and Control (I&C) Engineer

Emergency Plan Change Assessment

The Ginna Emergency Plan currently identifies a Minimum Staff of one (1) Core Thermal/Hydraulic Engineers, one (1) Mechanical Engineer and one (1) Electrical Engineer, consistent with the NRC's Alternative Guidance. These positions will continue as Minimum Staff in the proposed Ginna Emergency Plan Table. Note that the TSC Operations Manager is retained as Minimum Staff, but is relocated to the Emergency Classifications Function (reference step 3.2.6).

The following positions, currently identified as Minimum Staff under the Ginna Emergency Plan, are being re-categorized as Full-Augmented Staff and managed within an EPIP.

EOF Technical Advisor – The EOF Technical Advisor is identified as Minimum Staff in the EP-AA-1012, Figure 2-1, Minimum On-Site Staffing Requirements. The EOF Technical Advisor is reclassified as Full Augmentation. Under the Ginna Emergency Plan, the EOF Technical Advisor does not directly accomplish EP functions under the NRC's Alternative Guidance, but rather support other personnel at the EOF. The position, as currently defined in the Ginna Emergency Plan, would not be considered as part of the absolute minimum ERO 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). The EOF Technical Advisor performs support activities such as supervisory actions, evaluations, coordination, assistance and monitoring activities). Specific responsibilities include:

- The EOF Technical Advisor provides technical expertise to the EOF Staff.

- The EOF Technical Advisor tasks are to:
  - Track and trend critical parameters.
  - Monitor plant status and Control Room activities.
  - Provide input for facility briefs and updates.

Each of these tasks above are considered support activities and are not required to directly accomplish any of the NRC's Alternative Guidance identified functions. As such, the EOF Technical Advisor position can be deleted from the Minimum Staff and maintained as a Full Augmentation position. The EOF Technical Advisor position and the listed responsibilities are being relocated to an EPIP.

TSC Technical Manager – Under the Ginna Emergency Plan, the TSC Technical Manager responsibilities do not directly perform actions necessary to accomplish EP functions under draft NUREG-0654, Revision 2 guidance, but rather support other personnel at the TSC. The position, as currently defined in the Ginna Emergency Plan, would not be considered as part of the absolute minimum ERO 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). The TSC Technical Manager performs support activities such as supervisory actions, evaluations, coordination, assistance and monitoring activities). Specific responsibilities include:

- *Manage the activities of the TSC engineering / technical staff.*
- *Ensure additional personnel and/or equipment is arranged for, as necessary.*
- *Provide engineering support for accident detection and assessment.*
- *Develop mitigative strategies based on assessment of the event.*
- *Analyze and develop extreme measures actions (SAMGs, EDMGs, §50.54(x) or suspend security controls).*
- *Provide input for facility briefs.*

Each of these tasks above are considered support activities and are not required to directly accomplish any of the draft NUREG-0654, Revision 2 guidance identified functions. As such, the TSC Technical Manager position can be deleted from the Minimum Staff and maintained as a Full-Augmentation position. The TSC Technical Manager position and the listed responsibilities are being relocated to an EPIP.

NRC's Alternative Guidance Alignment

Ginna will staff a Core Thermal/Hydraulic Engineer, a Mechanical Engineer, and an Electrical Engineer at 60 minutes to provide engineering coverage related to their specific discipline. The EOF Technical Advisor position is not identified in the NRC's Alternative Guidance. There are no differences or deviations from the NRC's Alternative Guidance. The proposed ERO staffing is consistent with the NRC's Alternative Guidance. The assigned major tasks are aligned with those stated in the NRC's Alternative Guidance.

3.2.8 EP Function: Security

The Ginna Security Force is controlled and maintained by the NRC-approved Physical Security Plan (PSP) and is not reflected in the Emergency Plan. However, the establishment of a Security position in the TSC is advantageous to ensure effective coordination between the security force and the ERO, particularly for events where offsite resources are necessary as well as for security related events and site personnel accountability. The augmentation (support) of this function is available within 60 minutes of an Alert ECL, or greater, and is staffed by Security personnel in the TSC to coordinate security-related activities with that of the ERO. The command and control staff of the TSC all respond within 60 minutes of an Alert ECL, or greater, to ensure that the ED has access to the resources and expertise of the site staff in order to develop response plans for a wide-spectrum of events.

a. On-Shift Staff – The table below identifies the current and proposed Ginna Emergency Plan On-Shift ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Security – On-shift Staff		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
• Per the Station Security Plan	• Security staffing per the site-specific security plan	• Security staffing per the site-specific security plan

Emergency Plan Change Assessment

There are no changes between the current Ginna Emergency Plan staffing and the proposed changes to the Emergency Plan for the on-shift Security function.

NRC's Alternative Guidance Alignment

There are no differences or deviations from the NRC's Alternative Guidance. The proposed ERO staffing is consistent with the NRC's Alternative Guidance. The assigned major tasks are aligned with those stated in the NRC's Alternative Guidance.

b. Minimum Staff – The table below identifies the current and proposed Ginna Emergency Plan ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Security – Minimum Staff		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
• Per the Station Security Plan	• (1) TSC Security Coordinator	• (1) TSC Security Liaison

Emergency Plan Change Assessment

Ginna is revising the Emergency Plan to re-categorize the Full Augmentation TSC Security Coordinator position as Minimum Staff. The addition of Minimum Staff position ensures timely and effective coordination between the security force and the ERO, particularly for events where offsite resources are necessary as well as for security related events and site personnel accountability.

NRC's Alternative Guidance Alignment

Ginna will staff a TSC Security Coordinator at 60 minutes to be a liaison to the Security Force. There are no differences or deviations from the NRC's Alternative Guidance. The proposed ERO staffing is consistent with the NRC's Alternative Guidance. The assigned major tasks are aligned with those stated in the NRC's Alternative Guidance.

3.2.9 EP Function: Repair Team Activities

The NRC has determined that, from an EP perspective, the ability to get Emergency Core Cooling System (ECCS) equipment operational was the primary basis for necessitating maintenance expertise while on-shift. The Ginna ECCS are designed to be redundant and diverse such that common mode failures are very unlikely. From the Ginna UFSAR:

> *Several engineered safety features have been incorporated into the plant design to reduce the consequences of a loss-of-coolant accident. These safety features include a safety injection system (Emergency Core Cooling System (ECCS)). This system automatically delivers borated water to the reactor vessel for cooling under high and low reactor coolant pressure conditions. The safety injection system also serves to insert negative reactivity into the core in the form of borated water during an uncontrolled plant cooldown following a steam line break or an accidental steam release. Other safety features which have been included in the reactor containment design are a containment air recirculation, cooling, and filtration system, which would effect a depressurization of the containment following a loss of coolant and provide for iodine filtration if fission products are released from the core; and a containment spray system which would depressurize the containment and remove elemental iodine from the atmosphere by a washing action. The containment spray system and containment air recirculation, cooling, and filtration system are redundant containment heat removal systems.*

…The engineered safety features protection systems provided for the station have sufficient redundancy of component and power sources such that under the conditions of a design basis loss-of-coolant accident, the system can, even in the event of a single failure, maintain emergency core cooling, maintain the integrity of the containment, and perform other safeguards functions to ensure that post accident exposures are maintained below the guidelines of 10 CFR 100.

The systems provided are:

A. *The containment system, which provides an essentially leak tight barrier against the escape of fission products. The containment penetrations and liner weld seams are provided with a leak test system, which can be utilized to check the integrity of these two locations that are the most likely sources of containment leakage. Very low leakage requirements are also imposed on the containment isolation valves.*

B. *The safety injection system, which provides borated water to cool the core by injection into the cold legs of the reactor coolant loops and by injection over the top of the core through nozzles that penetrate the reactor vessel.*

C. *The containment recirculation fan cooler (CRFC) and filtration system, which provides a dynamic heat sink to cool the containment atmosphere and filtration of the containment atmosphere to remove airborne particulate and halogen fission products that form the source for potential public exposure. The system utilizes the normal containment ventilation and cooling equipment in addition to the charcoal filters.*

D. *The containment spray system, which provides a spray of cool, chemically treated borated water to the containment atmosphere to provide additional heat sink and iodine removal capability together with the containment air recirculation cooling and filtration system.*

E. *The hydrogen recombiners, which limit the concentration of hydrogen in containment following a loss-of-coolant accident.*

F. *Auxiliary systems, which serve to ensure the operability of the above systems.*

As a result of the redundant and diverse design, the need to accommodate maintenance functionality on-shift is unnecessary. Nevertheless, a minimum number of Maintenance personnel are assigned to respond to an event as part of the ERO, with more personnel available on an as-needed basis depending on the event.

The augmentation (support) of the Electrical and Mechanical positions occur within 60 minutes of an Alert ECL, (or greater), and is staffed in the OSC. The augmentation (support) of the I&C position is available within 90 minutes of an Alert ECL, or greater, and is staffed in the OSC. The OSC is the ERF associated with maintenance tasks, as directed by the Command and Control staff in the TSC.

a. On-Shift Staff – The table below identifies the current and proposed Ginna Emergency Plan On-Shift ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Repair Team Activities – On-shift Staff		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
• None Specified	• None Specified	• None Specified

Emergency Plan Change Assessment

The current Ginna Emergency Plan does not specifically mention on-shift staffing to address on-shift Repair and Corrective Actions. Ginna staff are trained to perform all the necessary actions to initiate the station ECCS systems. The proposed revision utilizes the language from the NRC's Alternative Guidance

NRC's Alternative Guidance Alignment

There are no differences or deviations from the NRC's Alternative Guidance.

b. Minimum Staff – The table below identifies the current and proposed Ginna Emergency Plan ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Repair Team Activities – Minimum Staff		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
• (1) Mechanical Maintenance (OSC) • (1) Electrical Maintenance (OSC) • (1) I&C Maintenance (OSC)	• (1) OSC Mechanical Maintenance Technician • (1) OSC Electrical Maintenance Technician • (1) OSC I&C Technician @ 90 minutes Additional Mechanical and Electrical Maintenance Techs as needed.	• (1) Mechanic (OSC) • (1) Electrician (OSC) • (1) I&C Technician @ 90 minutes (OSC) • Additional Mechanical and Electrical Maintenance Techs as needed.

Emergency Plan Change Assessment

The current Ginna Emergency Plan provides for one (1) Mechanical Maintenance technician, one (1) Electrical Maintenance Technicians and one (1) I&C to the OSC at 60 minutes. The Maintenance response is consistent with the NRC's Alternative Guidance, which provides for one (1) technician from each discipline to be staffed as Minimum Staff. The Ginna Emergency Plan is annotated that additional technicians would be called as needed depending on the nature of the emergency repairs needed. Ginna has a proven Work Management program that has demonstrated the ability to respond to emergent work activity issues during off hours, weekends, and holidays. In an emergency situation, the Minimum Staff OSC responders from each Maintenance discipline would be available to assess the required work activities, begin preparation activities, and request the needed support in a timely manner. The proposed staffing is consistent with the NRC's Alternative Guidance and provides the necessary personnel to respond to the emergency condition.

NRC's Alternative Guidance Alignment

Ginna will staff one (1) Mechanical and one (1) Electrical Maintenance Technician at 60 minutes to perform the maintenance activities from the OSC to respond to the emergency condition. An I&C Technician will respond within 90 minutes consistent with the NRC's Alternative Guidance. Depending on the need, additional Maintenance Technicians will be called in to support the OSC activities. There are no differences or deviations from the NRC's Alternative Guidance.

3.2.10 EP Function: Supervision of Repair Team Activities

The ability to effectively supervise repair team personnel during emergency response is important. The augmentation (support) of these functions is as follows:

- A Lead OSC Supervisor (OSC Director) is staffed within 60 minutes of an Alert ECL, (or greater), and is staffed in the OSC.

- An Electrical Supervisor/Lead, a Mechanical Supervisor/Lead, an I&C Supervisor/Lead, and an RP Supervisor/Lead is staffed within 90 minutes of an SAE ECL, or greater, and is staffed in the OSC.

The OSC Director can effectively manage the Maintenance resources for the additional 30 minutes prior to the specific craft (Mechanical, Electrical, or I&C) respond, as demonstrated through drills and exercises.

a. On-Shift Staff – There are no on-shift staff assigned to this EP Function at Ginna.

EP Function: Supervision of Repair Team Activities – On-Shift Staff		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
• None Specified	• None Specified	• None Specified

b. Minimum Staff – The table below identifies the current and proposed Emergency Plan ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Supervision of Repair Team Activities – Minimum Staff		
Current Emergency Plan requirements	Proposed Emergency Plan Table	NRC's Alternative Guidance
• (1) OSC Director • (1) Assistant OSC Director • (1) RP Lead (OSC) • (1) Chemistry Lead (OSC) • (1) Maintenance Manager (TSC)	• (1) OSC Director • (1) Electrical Maintenance Supervisor/Lead @ 90 mins (OSC) • (1) Mechanical Maintenance Supervisor/Lead @ 90 mins (OSC) • (1) I&C Supervisor/Lead @ 90 mins (OSC) • (1) RP Supervisor/Lead @ 90 mins (OSC)	• (1) Lead OSC Supervisor • (1) Electrical Supervisor @ 90 mins • (1) Mechanical Supervisor @ 90 mins • (1) I&C Supervisor @ 90 mins • (1) Radiation Protection Supervisor @ 90 mins

<u>Emergency Plan Change Assessment</u>

The current Ginna Emergency Plan Figure 2-1 identifies the Supervisory positions of OSC Director, Assistant OSC Director, TSC Maintenance Manager, RP Lead and Chemistry Lead for OSC ERO positions. The OSC Director effectively manages the Maintenance resources upon activation of the facility.

Ginna is adding three (3) Minimum Staff positions to the OSC to be staffed at 90 minutes. These include an Electrical Maintenance Supervisor/Lead Technician, a Mechanical Maintenance Supervisor/Lead Technician, and an I&C Supervisor/Lead Technician. The RP Supervisor/Lead Technician is relocated under the Supervision of Repair Team Activities function. The addition of the three (3) supervisor positions enhances the ERO response by putting in place effective supervision repair team personnel early in the emergency response.

Assistant OSC Director - The Assistant OSC Director is being re-categorized from Minimum Staff to Full Augmentation Staff. Under the Ginna Emergency Plan, the Assistant OSC Director does not directly perform accomplish EP functions under the NRC's Alternative Guidance, but rather support other personnel at the OSC. The position, as currently defined in the Emergency Plan, would not be considered as part of the absolute minimum ERO 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). The Assistant OSC Director performs support activities such as supervisory actions, validations, coordination, and assistance activities). The task is performed by the minimum staff craft supervisors/lead technicians. Specific responsibilities described in the Emergency Plan:

- *The Assistant OSC Director coordinates in plant task and team development and team dispatch.*

The task above is considered a support activity and is not required to directly accomplish any of the NRC's Alternative Guidance identified functions. As such, the Assistant OSC Director position can be deleted from the Minimum Staff and maintained as a Full Augmentation position. The Assistant OSC Director position and the listed responsibility is being relocated to an EPIP.

TSC Maintenance Manager - The Maintenance Manager is being re-categorized from Minimum Staff to Full-Augmentation Staff. Under the Ginna Emergency Plan, the TSC Maintenance Manager responsibilities do not directly perform actions necessary to accomplish EP functions under the draft NUREG-0654, Revision 2 guidance, but rather support other personnel at the TSC. The position, as currently defined in the Emergency Plan, would not be considered as part of the absolute minimum ERO 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). The TSC Maintenance Manager performs support activities such as supervisory actions, validations, coordination, and assistance activities). Specific responsibilities include:

- *Direct the total onsite maintenance and equipment restoration effort.*
- *Coordinate repair and OSC team task information between the TSC and OSC.*
- *Determine adequacy of OSC staffing.*
- *Provide input for facility briefs.*

Each of these tasks above are considered support activities and are not required to directly accomplish any of the draft NUREG-0654, Revision 2 identified functions. As such, the TSC Maintenance Manager position can be deleted from the Minimum Staff and maintained as a Full-Augmentation position. The TSC Maintenance Manager position and the listed responsibilities are being relocated to an EPIP.

Chemistry Lead

The proposed revision also removes the one (1) Minimum Staff Chemistry Lead from Figure 2-1. The Chemistry/Radiochemistry function listed in Table B-1 to Revision 1 of NUREG-0654, is no longer needed as the need for immediate reactor coolant sampling has been reduced due to the variety of available plant indications of fuel damage available at Ginna. Early indications of fuel damage can be identified through Containment Radiation Monitors, Core Instrumentation, or Effluent Radiation Monitors, all of which are available in the MCR. If reactor sampling is desired, Chemistry Lead Technicians are on staff at Ginna and would be called in as necessary to support the event.

NRC's Alternative Guidance Alignment

Under the proposed Ginna Emergency Plan staffing, the OSC Director position is staffed within 60 minutes to oversee the activation of the OSC facility and the maintenance craft as they arrive. The Mechanical, Electrical, I&C, and RP Supervisors/Lead Technicians staff at 90 minutes to support coordination and supervision of repair team activities.

Ginna proposes one difference to the NRC's Alternative Guidance. Specifically, Ginna proposes to allow a Maintenance or RP Lead Technician to fill the supervisory role at 90 minutes. Under the Exelon Maintenance and RP programs, Lead Technicians are qualified, experienced craft technicians who successfully demonstrate the day-to-day leadership of the technician work force and act as lead on back shifts. Duties and responsibilities include training and development of other employees in performing preventive maintenance and routine equipment service activities. Basic qualifications for a Lead Technician include demonstrated reliability and responsibility and the ability to make quick and effective technical decisions, as well as demonstrated situational leadership, environmental and safety stewardship. The experience and qualification of Ginna Lead Technicians satisfy the requirements and the needs of the OSC for the Supervision of Repair Team Activities EP Function.

Other than the difference discussed above, the proposed ERO staffing is consistent with the NRC's Alternative Guidance. The assigned major tasks are aligned with those stated in the NRC's Alternative Guidance.

3.2.11 EP Function: Field Monitoring Teams (FMTs)

The ability to locate, monitor, and track a radioactive plume is important to ensure appropriate protective measures are taken in response to a radiological event. The ability to staff these teams before they may be needed (i.e., before a radiological release) greatly enhances the ability to provide timely and accurate PARs.

The augmentation (support) for these teams is as follows:

- On-site Field Monitoring

  An On-site Field Monitoring person is staffed consisting of personnel to monitor radiation. This on-site position is responsible for radiological monitoring of the site's PA. The size and configuration of the Ginna PA does not support the need of an accompanying driver. The PA can be easily and efficiently traversed without use of a vehicle. This On-Site Field Monitor Team person is staffed within 60 minutes of an Alert ECL, or greater.

  The On-site Field Monitor is qualified to assess radiation and contamination levels, but is not necessarily an ANSI-qualified RP Technician since the person is under the direct supervision of RP Supervisor/Lead Technician. Note, the Onsite On-site Field Monitor would not be staffed if the radiological conditions jeopardize the safety of the Onsite Field Monitor.

- Offsite Field Monitoring

  An Offsite FMT is staffed, consisting of a Monitor and a driver, within 60 minutes of an Alert ECL, or greater. This Offsite FMT is responsible for locating, monitoring, and tracking a radioactive plume, as well as obtaining environmental samples as necessary (e.g., air, water, vegetation, etc.). The Monitor is qualified to assess radiation and contamination levels, but need not be an ANSI-qualified RP Technician as long as the FMT is under the direct supervision of senior staff in the TSC or EOF.

  Another Offsite FMT is staffed, consisting of a monitor and a driver, within 90 minutes of an Alert ECL, or greater. This Offsite FMT is also responsible for locating, monitoring, and tracking a radioactive plume, as well as obtaining environmental samples (e.g., air, water, vegetation, etc.). The Monitor is qualified to assess radiation and contamination levels, but need not be an ANSI-qualified RP technician as long as the FMT is under the direct supervision of senior staff in the TSC or EOF.

a. On-Shift Staff – There are no on-shift staff assigned to this EP Function at Ginna.

EP Function: Field Monitoring Teams – On-Shift Staff		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
• N/A	N/A	N/A

b. Minimum Staff – The table below identifies the current and proposed Ginna Emergency Plan ERO, as well as the NUREG-0654, Revision 2 guidance for this EP Function.

EP Function: Field Monitoring Teams – Minimum Staff		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
• (2) Onsite Monitoring Team Personnel • (4) Offsite Field Team Personnel	• Onsite Field Monitoring Individual (Qualified Individual) • Offsite Field Monitoring Team A (1 Qualified Individual and 1 Driver) • Offsite Field Monitoring Team B @ 90 mins (1 Qualified Individual and 1 Driver)	• Onsite Field Monitoring Team (1 Qualified Individual and 1 Driver) • Offsite Field Monitoring Team A (1 Qualified Individual and 1 Driver) • Offsite Field Monitoring Team B @ 90 mins (1 Qualified Individual and 1 Driver)

Emergency Plan Change Assessment

Onsite Field Monitoring - The current Ginna Emergency Plan designates two (2) RP personnel as Minimum Staff for the EP function of On-site Surveys. The proposed changes to the Ginna Emergency Plan designate one (1) task qualified person for on-site surveys. The number of task qualified personnel for this function is consistent with the NRC's Alternative Guidance. Note there is a difference with respect to the designated on-site FMT Driver (discussed below). The reduction in RP personnel to this task is acceptable because one (1) Field Monitor dedicated to monitor and survey the site area is sufficient to provide current and timely data to the TSC/EOF in emergency conditions. At Exelon stations, the onsite Field Monitor is

responsible only for monitoring the PA. The size of the station's PA allows traverse in minutes and a designated driver would not be required to perform this function. The monitoring equipment is hand-held and does not require two (2) personnel for transport or operation. The Owner Controlled Area (OCA) has an infrastructure that supports vehicular traffic and will be monitored by the Offsite FMTs. This is the current Exelon process and has been demonstrated successfully through drills and exercises at Exelon stations.

Offsite Field Monitoring Teams - The Offsite FMTs at Ginna currently consist of two (2) Field Teams staffing at 60 minutes; each consisting of a driver and one (1) task qualified person. Ginna proposes to change the Offsite FMTs to be consistent with the NRC's Alternative Guidance. Specifically, there would be two (2) FMTs, but one (1) FMT would staff at 60 minutes and one FMT would staff at 90 minutes. Additional time in the response is considered acceptable. Since both FMTs are expected to respond to an event and in order to better coordinate radioactive plume tracking action(s), allowing for additional time provides some flexibility in staffing this ERO function without compromising the "reasonable assurance" finding in accordance with 10 CFR 50.47(a).

NRC's Alternative Guidance Alignment

The proposed ERO staffing for Onsite Field Monitoring is different than that proposed in the NRC's Alternative Guidance. Specifically, Ginna On-site Field Monitoring will be staffed without a designated driver.

At Exelon stations, the On-site Field Monitor is responsible only for monitoring the area within the PA. The size of the station's PA allows traverse of foot in minutes and a designated driver would not be required to perform this function. The monitoring equipment is hand-held and does not require a vehicle for transport.

For Exelon stations, the Owner Controlled Area (OCA) supports vehicular traffic. The Offsite FMTs is responsible for surveying the OCA. This has been demonstrated successfully through drills and exercises at Exelon stations. The 60-minute and 90-minute Offsite FMTs will staff consistent with the NRC's Alternative Guidance. There are no differences or deviations from the NRC's Alternative Guidance for the Offsite FMTs.

3.2.12 EP Function: Media Information

The Media Information function includes the following tasks:

- Manage and coordinate media information related to the event.

Media relations is an important part of effective emergency response and is consistent with the National Incident Management System (NIMS). Revision 1 of NUREG-0654 left the exact staffing composition flexible, with input from applicable OROs, and from the Federal Emergency Management Agency (FEMA).

The augmentation (support) of this function is defined for Ginna to be that which is absolutely needed to support this function (i.e., without those positions this function could not occur).

Ginna is supported through the Exelon Communications Department at all times. The Communications Department responds to media inquiries initially for any ECL. The Communications Department coordinates with Exelon Management and ERFs to respond to media inquiries. Press releases are issued as appropriate from the Communications Department.

Within 90 minutes of an Alert ECL or higher, the Ginna Emergency Plan is revised to describe the positions of Corporate Spokesperson, Public Information Director, and Joint Information Center (JIC) Director as those necessary to support the additional news media related tasks associated with the more significant classifications. These tasks include periodic press briefings, media engagement, and coordination with State and local Emergency Management Agencies (EMAs).

a. On-Shift Staff – There are no on-shift staff assigned to this EP Function; however, the Exelon Communications Department are available to address news media inquiries 24 hours/day. This is consistent with the NRC's Alternative Guidance.

EP Function: Media Information – On-Shift Staff		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
N/A	N/A	N/A

b. Minimum Staff – The table below identifies the current and proposed Ginna Emergency Plan ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Media Information – Minimum Staff		
Current Emergency Plan Requirements	Proposed Emergency Plan Table	NRC's Alternative Guidance
• (1) Company Spokesperson • (1) JIC Manager • (1) Media Monitor/Rumor Control Coordinator • (1) JIC Logistics Manager	• (1) Corporate Spokesperson (established @ 90 min of an Alert or higher ECL) • (1) JIC Director (established @ 90 min of an Alert or	• JIC/JIS staff to address media inquiries at the Alert ECL • Staff to perform JIC/JIS related tasks at SAE ECL or greater

EP Function: Media Information – Minimum Staff		
Current Emergency Plan Requirements	Proposed Emergency Plan Table	NRC's Alternative Guidance
• (1) Technical Advisor	higher ECL) • (1) Public Information Director (Does not need to be performed in the JIC, but needs to be established @ 90 min of an Alert or higher ECL)	

Emergency Plan Change Assessment

The JIC Minimum Staff is identified in the Ginna Emergency Plan EP-AA-1012, Figure 2-1, Minimum On-Site Staffing Requirements. Specifically, the Ginna Emergency Plan identifies (1) Company Spokesperson, (1) JIC Manager, (1) Media Monitor/Rumor Control Coordinator, (1) Logistics Manager and (1) Technical Advisor as Minimum Staff and required to respond within 60 minutes of an Alert or higher event declaration to the JIC.

The proposed change to the Ginna Emergency Plan identifies three (3) Minimum Staff positions to be staffed following an Alert ECL to address the Media Information EP Function. The positions consist of the Corporate Spokesperson, Public Information Director, and JIC Director. The positions are established within 90 minutes of an Alert or higher ECL. The revision increases the JIC ERO response from 60 minutes to 90 minutes.

The following positions, currently identified as Minimum Staff within the Ginna EPIPs, are being re-categorized as Full-Augmented Staff.

JIC Logistics Manager - Under the Ginna Emergency Plan, the JIC Logistics Manager does not directly accomplish EP functions under NRC's Alternative Guidance, but rather support other personnel at the JIC. The position would not be considered as part of the absolute minimum ERO 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). The JIC Logistics Manager performs support activities such as supervisory actions, evaluations, coordination, assistance and monitoring activities). Specific responsibilities include:

- *Manage the administrative support staff.*
- *Develop ERO shift relief rosters for the facility.*
- *Arrange for logistics support.*

- *Oversee set-up and testing of JIC equipment.*
- *Maintain access control to the JIC.*
- *Provide input for facility briefs.*
- *Oversee collection of technical data and station activities for drafting Media Statements and answering JIC questions.*
- *Coordinate preparation, review and distribution of Media Statements.*
- *Obtain ED approval for the technical content of Media Statements.*
- Keep JIC staff informed of plant status and Exelon emergency response activities.

JIC Technical Advisor - Under the Ginna Emergency Plan, the JIC Technical Advisor does not directly accomplish EP functions under the NRC's Alternative Guidance, but rather support other personnel at the TSC. The position would not be considered as part of the absolute minimum ERO 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). The JIC Technical Advisor performs support activities such as supervisory actions, evaluations, coordination, assistance and monitoring activities). Specific responsibilities include:

- *Provide technical expertise to the JIC staff.*
- *Assist the News Writer with development of technically accurate media statements.*
- *Provide answers to technical questions from the news media regarding the emergency situation.*
- *Periodically monitor EOF/TSC briefings and Operations Status Line to obtain information.*
- *Provide technical information support to the Company Spokesperson.*
- *Monitor event information on the facility display systems.*
- *Provide input for facility briefs and updates.*

Media Monitor/Rumor Control Coordinator - Under the Ginna Emergency Plan, the Media Monitor/Rumor Control Coordinator responsibilities include Media Monitoring/Rumor Control activities which will be the responsibility of the Public Information Director until the JIC is fully staffed. The other responsibilities include actions which are not necessary to accomplish EP functions under the NRC's Alternative Guidance, but rather support other personnel at the JIC. The position, as currently defined in the Ginna Emergency Plan, would not be considered as part of the absolute minimum ERO 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). The Media Monitor/Rumor Control Coordinator performs support activities such as supervisory actions, evaluations, coordination, assistance and monitoring activities). Specific responsibilities include:

- *Supervise media monitoring and Inquiry Phone Team personnel.*

- *Review Media Monitoring team information for trends, misinformation and rumors.*
- *Review Phone Team information for trends, misinformation and rumors.*
- *Ensure adequate staff is available to perform media monitoring and phone team functions.*
- *Provide input for facility briefs and updates.*

The Ginna Emergency Plan is revised to activate the (3) positions within 90 minutes of an Alert or higher classification. The Exelon Corporate Communications Department is capable of responding to and addressing events prior to the arrival of the JIC Minimum Staff at 90 minutes of an Alert ECL or higher.

NRC's Alternative Guidance Alignment

The proposed ERO staffing activates the JIC facility at a lower ECL than the NRC's Alternative Guidance. Exelon proposes to activate the JIC facility within 90 minutes of an Alert ECL or higher. The 90-minute activation time provides for a larger population of candidates to fill the JIC minimum staff positions and is offset to some degree by the activation of the JIC at a lower ECL than stipulated in the NRC's Alternative Guidance. The Exelon Communications Department is will provide for the JIC functions until the JIC is activated and turnover of responsibility occurs.

Ginna will staff a Corporate Spokesperson at the JIC to maintain Command and Control of the JIC and conduct periodic briefings with the news media. The JIC Director is staffed at the JIC to coordinate with the State, local and Federal agencies to maintain factual consistency of information conveyed. Ginna will also staff a Public Information Director to oversee the issuance of news releases and media monitoring/rumor control. The Public Information Director function may be performed remotely by taking advantage of advancements in communication technology.

3.2.13 EP Function: Information Technology

The Information Technology (IT) function includes the following tasks:

- If Emergency Plan functions rely on computer-based equipment, provide IT support.

The ever-increasing advances in technology have led to significant enhancements in many areas of emergency response, such as communications, monitoring, displays, digital procedures, etc. Ginna has assessed the use of this technology as it is used to enhance the ability to protect the health and safety of the public with respect to EP.

a. On-Shift Staff – There are no on-shift staff assigned to this EP Function; however, the Exelon IT department maintains a 24 hour/day HELP Desk to assist users with IT related issues.

EP Function: Information Technology – On-Shift Staff		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
N/A	N/A	N/A

b. Minimum Staff – The table below identifies the current and proposed Ginna Emergency Plan ERO, as well as the NRC's Alternative Guidance for this EP Function.

EP Function: Information Technology – Minimum Staff		
Current Emergency Plan, Figure 2-1	Proposed Emergency Plan Table	NRC's Alternative Guidance
• Not Applicable	• (1) EOF/JIC Computer Specialist (@ 90 min from Alert or higher) 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.	• (1) EOF/JIC/JIS IT Lead @ SAE ECL or greater 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. • (1) TSC IT Lead @ 90 mins 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.

Emergency Plan Change Assessment

The current Ginna Emergency Plan does not identify IT positions as Minimum Staff. Ginna maintains a Computer Specialist position at the EOF and TSC as a Full Augmentation position. Performance of digital equipment at EOF and TSC has shown to be acceptable during drills and exercises with this staffing. With the built-in redundancy for communication systems and digital EP assets, Ginna has not

identified a need to maintain an IT Lead as a Minimum Staff position at the TSC facility. The EOF Computer Specialist is revised to Minimum Staff with a response time of 90 minutes from the Alert or higher ECL.

NRC's Alternative Guidance Alignment

Ginna proposes to staff an IT Lead at the EOF as Minimum Staff; however, Ginna proposes to staff the position within 90 minutes of an Alert or higher rather than 60 minutes of a Site Area Emergency. Ginna does not propose to staff an IT Lead position as minimum staff at the TSC.

The Ginna EOF and TSC contain multiple computers and programs in the facility which support EP functions. This includes Plant Parameter Display Systems, Core Damage Assessment, the Plant Process Computer, and Dose Assessment programs, as well as Web EOC, fax, and copy machines. Performance during drills and exercises indicates consistent performance of the digital assets in the facilities. The communications, dose assessment and core damage assessment equipment is periodically tested and issues, if any identified, are promptly addressed. The facilities and respective digital equipment are frequently used through administration of training for each team, as well as drills and Exercises. In addition, the IT Department maintains a Site IT Duty Person (SIDP) per procedure IT-AA-2001, Information Technology Response to Emergent Issues Process, for each station. During duty periods, the SIDP must be fit for duty, available, reachable by telephone and/ or cell phone at all times. The SIDP shall function as the single point of contact for site IT during the duty period.

- When contacted, must respond to all requests for emergent assistance, including conference calls.
- Manage the response to the emergent IT issues at the site. Primary role to coordinate recovery actions with Vendors and other support teams, as needed.
- Ensure that the appropriate priority and resources are assigned to address all emergent issues.
- Utilize SY-AA-102-201, Call-Outs for Unscheduled Work, for any required Call- Outs.

Additionally, Exelon maintains an IT HELP Desk 24 hours per day, 7 days a week. Many computer issues can be addressed remotely with an IT specialist at the HELP Desk. If additional help is needed at the TSC, the EOF IT Specialist will be available to support resolution of the issue.

In addition, each of these EP related digital assets in the TSC and EOF were evaluated as part of implementation of the Cyber Security Rule, 10 CFR 73.54(b). Under NEI 13-10, "Cyber Security Control Assessments," EP Critical Digital Assets at the TSC and EOF have been assessed and controls have been put in place to protect the assets against cyber-attack. In conjunction with these controls, alternate administrative, non-digital, or adequately independent means have been put in place

for performing each EP function, should the digital component or program fail for any reason. For example, both the Core Damage Assessment program and the Dose Assessment programs have a redundant, non-network laptop computer at their respective facility to maintain the EP function should the designated computer fail. ERO position procedures have written instructions for backup communication measures should the primary means fail. In the event of a failure of the Plant Process Computer, the Classification function can be maintained through the MCR.

Finally, performance of digital assets are monitored through either the Corrective Action Program or the EP Drill and Exercise critique process. Performance trends are monitored, and corrective actions are implemented as necessary.

3.2.14 EP Function: First Aid and Rescue Operations

The First Aid and Rescue Operations EP Function no longer exists in the NRC's Alternative Guidance.

a. On-Shift Staff – The table below identifies the current and proposed Ginna Emergency Plan on-shift ERO staff.

EP Function: First Aid and Rescue Operations – On-Shift Staff	
Current Emergency Plan	Proposed Emergency Plan
• (3) First Aid Team Personnel (collateral duty of Fire Brigade)	• Not Applicable

Emergency Plan Change Assessment

The Ginna Emergency Plan Figure 2-1 identifies personnel filling the EP Function of Rescue Operations and First Aid as collateral duties. Ginna utilizes the Fire Brigade to satisfy this responsibility. First Aid and Rescue is no longer identified as an EP Function under the NRC's Alternative Guidance. First Aid is still maintained as part of the NRC's Alternative Guidance, guidance under Section II.L, *"Planning Standard for Medical and Public Health Support."* As such, Ginna will continue to maintain qualified First Aid and Rescue personnel on shift; however, the personnel resources are no longer listed on the Emergency Plan Table consistent with the NUREG-0654, Revision 2 guidance.

NRC's Alternative Guidance Alignment

The First Aid and Rescue Operations EP Function does not exist in the NRC's Alternative Guidance Table B-1 guidance. Therefore, removing the Function from the Emergency Plan is consistent with the NRC's Alternative Guidance.

b. Minimum Staff – There are no ERO resources assigned to First Aid and Rescue Operations under the current Ginna Emergency Plan. Additionally, the First Aid and Rescue Operations EP Function does not exist in the NRC's Alternative Guidance. No revision is required to the Ginna Emergency Plan.

3.3 Full-Augmentation Staff Assessment

The table below identifies the current Ginna Full Augmentation ERO for each of the EP Functions. These positions are removed from the Emergency Plan and are either relocated to an EPIP or re-categorized as Minimum Staff, as annotated below.

EP Function: Notifications and Communication – Full-Augmentation Staff	
Current Emergency Plan	Proposed Emergency Plan
• (1) EOF HPN Communicator • (1) EOF Ops Communicator • (1) TSC Ops Communicator • (1) CR Ops Communicator • (1) OSC Ops Communicator • (1) OSC Team Tracker • (1) EOC Communicator • (1) State Liaison • (2) County Liaisons • Incident Command Post Liaison	Manage positions under Emergency Plan Implementing Procedures (EPIP)
EP Function: Radiological Assessment – Full-Augmentation Staff	
Current Emergency Plan	Proposed Emergency Plan
• (2) EOF Dose Assessors	• Manage positions under Emergency Plan Implementing Procedures (EPIP)
EP Function: Security – Full-Augmentation Staff	
Current Emergency Plan	Proposed Emergency Plan
• (1) TSC Security Coordinator	• TSC Security Coordinator changed to Minimum Staff
EP Function: Plant System Engineering, Repair and Corrective Actions – Full-Augmentation Staff	
Current Emergency Plan	Proposed Emergency Plan
• (1) OSC Mech. Group Lead • (1) OSC Elec. Group Lead • (1) OSC I&C Group Lead	• Group Leads positions to be changed to Minimum Staff

EP Function: Media Information – Full-Augmentation Staff	
Current Emergency Plan	Proposed Emergency Plan
• (1) Media Liaison • (1) News Writer • (2) Media Monitoring Team • (2) Inquiry Phone Team • (1) JIC Security	• Manage positions under Emergency Plan Implementing Procedures (EPIP)
EP Function: Resource Allocation and Administration Support – Full-Augmentation Staff	
Current Emergency Plan	Proposed Emergency Plan
• (1) EOF Logistics Manager • (2) TSC Administrative Staff • (2) EOF Administrative Staff • (2) JIC Administrative Staff • (2) OSC Administrative Staff • (1) Computer Specialist (TSC/OSC) • (1) Computer Specialist (EOF/JIC)	• EOF Logistics Manager, Administrative Staff and TSC/OSC Computer Specialist managed under Emergency Plan Implementing Procedures (EPIP) • EOF/JIC Computer Specialist changed to Minimum Staff

Neither NUREG-0654, Revision 1 or the NRC's Alternative Guidance discuss Full Augmentation positions under Table B-1. In the NRC's Alternative Guidance, Table B-1, Note iii addresses the required minimum staffing as compared to other staff not critical to the effective Emergency Plan implementation. Note iii states:

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

The intent of this note is to emphasize the distinction between ERO minimum staffing and ERO members who serve in a supporting capacity.

The Ginna Emergency Plan describes the Minimum Staff ERO that is the absolute minimum needed to implement the station's Emergency Plan (i.e., if any position or function is not staffed, then the Emergency Plan cannot be effectively implemented). Ginna utilizes additional Full Augmentation ERO Staff that are trained, qualified, and available to ensure all available licensee resources are used when a radiological emergency occurs and to provide for staff relief on a 24-hour / 7-day a week extended basis. The Full Augmentation Staff performs support functions such as intra-facility communications, organization liaisons, and expert advisors. This description of the additional Full Augmentation ERO Staff is being relocated from the Ginna Emergency Plan to an EPIP.

The Ginna Emergency Plan shall be effectively implemented utilizing the Minimum Staff positions. However, most Full-Augmentation Staff will still be assigned ERO teams, be expected to maintain Fitness-for-Duty during duty weeks, and be notified to respond to their ERF at the Alert or higher ECL. Their presence will not be required however to activate the respective ERFs.

The complete list of Full-Augmented Staff relocated from the Ginna Emergency Plan, along with their respective EP tasks is listed in Attachment 1C of this submittal. Each EP task assigned under the Emergency Plan is further evaluated and dispositioned in this Enclosure.

3.4 **Other Changes to the Emergency Plan**

3.4.1 Command and Control Turnover

The Exelon Standardized Radiological Emergency Plan EP-AA-1000, Part II, Sections B.3 and B.4, are being revised to reflect the changes to the Command and Control turnover description. With the proposed changes in ERO, the description of the turnover process is revised to more clearly describe the transfer of non-delegable duties for PARs and State/local notifications directly from the MCR to the EOF. The Command and Control turnover of responsibilities continues to occur between the MCR, TSC, and EOF concurrently on a bridge-line without delay.

Existing requirements and capabilities under the Emergency Plan have not been deleted or reduced as part of this revision and as such, the station Emergency Plan continues to meet regulatory requirements. A review of existing regulatory Commitments was made to ensure all existing commitments continue to be met.

3.4.2 Removal of Requirement to Augment Certain ERO at an Unusual Event

The Ginna Station Radiological Emergency Plan Annex, EP-AA-1012, provides for activation of certain ERO personnel at an Notice of Unusual Event. Specifically, the Plan states: "*The TSC or EOF will not usually be activated, although the Station Emergency Director, Operations Manager, TSC RPM and Technical Manager will normally report to the TSC to provide assistance."* The Emergency Plan is revised to remove this commitment to augment the ERO with selected staff

at an Unusual Event ECL. The change was implemented into the Ginna Emergency Plan in Revision 8 (1990) to supplement the on shift ERO in anticipation of an escalation of the ECL.

The Ginna Emergency Plan Annex defines an Unusual Event as occurring "*when conditions indicate a potential degradation of the level of safety of the plant. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs. Declaring an Unusual Event assures that the first step for any response later found to be necessary has been carried out by bringing onsite staff and offsite organizations to a state of readiness, thereby providing a system for handling information and decision-making*."

Ginna's ERO will continue to be notified at an Unusual Event in accordance with their Emergency Plan. Station personnel, including members of the ERO will be available to support the Emergency Response at the discretion of the Shift Emergency Director if needed.

The augmentation of the ERO at the Unusual Event ECL is not consistent with the NRC's Alternative Guidance and the commitment is being removed from the Emergency Plan Annex, EP-AA-1012, Step 3.2.

3.5 Impact of Proposed Changes on State Emergency Plan

3.5.1 Potential Impact of ERO Changes on Off-Site Emergency Response Organizational Interfaces

Exelon provided a draft copy of the License Amendment Request to representatives of Wayne County Emergency Management Office, Monroe County Office of Emergency Management and the New York State Office of Emergency Management (NYSOEM) to provide the proposed changes to Ginna's Emergency Plan.

Wayne County provided feedback via electronic mail dated August 7, 2018, and Monroe County provided feedback via electronic mail dated August 7, 2018. NYSOEM provided feedback via electronic mail dated August 15, 2018. Each Office stated that based on the initial review, the office did not have any concerns at this time. Refer to Enclosure 3, "Information Related to Review of Proposed Changes by the States and Counties," for a copy of the referenced communications.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

The proposed change has been evaluated to determine whether applicable regulations and requirements continue to be met.

Section 50.47, "Emergency plans," of Title 10 of the *Code of Federal Regulations* (10 CFR) sets forth the U.S. Nuclear Regulatory Commission's (NRC) Emergency Plan

requirements for nuclear power plant facilities. The regulation in 10 CFR 50.47(a)(1)(i) states, in part:

> …no initial operating license for a nuclear power reactor will be issued unless a finding is made by the NRC that there is reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency.

Section 50.47(b) establishes the standards that the onsite and offsite emergency response plans must meet for NRC staff to make a positive finding that there is reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency.

Planning Standard (2) of this section requires that:

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

Section IV.A of 10 CFR 50, Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," states:

> *The organization for coping with radiological emergencies shall be described, including definition of authorities, responsibilities, and duties of individuals assigned to the licensee's emergency organization and the means for notification of such individuals in the event of an emergency. Specifically, the following shall be included:*
>
> 1. *A description of the normal plant operating organization.*
> 2. *A description of the onsite emergency response organization (ERO) with a detailed discussion of:*
>   a. *Authorities, responsibilities, and duties of the individual(s) who will take charge during an emergency;*
>   b. *Plant staff emergency assignments;*
>   c. *Authorities, responsibilities, and duties of an onsite emergency coordinator who shall be in charge of the exchange of information with offsite authorities responsible for coordinating and implementing offsite emergency measures.*
> 3. *A description, by position and function to be performed, of the licensee's headquarters personnel who will be sent to the plant site to augment the onsite emergency organization.*
> 4. *Identification, by position and function to be performed, of persons within*

the licensee organization who will be responsible for making offsite dose projections, and a description of how these projections will be made and the results transmitted to State and local authorities, NRC, and other appropriate governmental entities.

5. *Identification, by position and function to be performed, of other employees of the licensee with special qualifications for coping with emergency conditions that may arise. Other persons with special qualifications, such as consultants, who are not employees of the licensee and who may be called upon for assistance for emergencies shall also be identified. The special qualifications of these persons shall be described.*
6. *A description of the local offsite services to be provided in support of the licensee's emergency organization.*
7. *By June 23, 2014, identification of, and a description of the assistance expected from, appropriate State, local, and Federal agencies with responsibilities for coping with emergencies, including hostile action at the site. For purposes of this appendix, "hostile action" is defined as an act directed toward a nuclear power plant or its personnel that includes the use of violent force to destroy equipment, take hostages, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, projectiles, vehicles, or other devices used to deliver destructive force.*
8. *Identification of the State and/or local officials responsible for planning for, ordering, and controlling appropriate protective actions, including evacuations when necessary.*
9. *By December 24, 2012, for nuclear power reactor licensees, a detailed analysis demonstrating that on-shift personnel assigned emergency plan implementation functions are not assigned responsibilities that would prevent the timely performance of their assigned functions as specified in the emergency plan.*

Revision 1 to NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," dated November 1980, was intended to aid licensees, applicants for licenses, or State and local emergency response organizations in the development of their Radiological Emergency Response Plans. The NRC endorsed this document for use in this effort via Revision 2 to Regulatory Guide (RG) 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors," dated October 1981. RG 1.101 allowed for licensees to submit alternatives to the guidance provided in NUREG-0654/FEMA-REP-1 for staff review and approval if necessary.

Section II.B of NUREG-0654/FEMA-REP-1, Revision 1, states, in part:

> *On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident*

response in key functional areas is maintained at all times, timely augmentation of response capabilities is available, and the interfaces among various onsite response activities and offsite support and response activities are specified.

Evaluation Criteria 5 of Section II.B of NUREG-0654/FEMA-REP-1, Revision 1, states, in part:

Each licensee shall specify the positions or title and major tasks to be performed by the persons to be assigned to the functional areas of emergency activity. For emergency situations, specific assignments shall be made for all shifts and for plant staff members, both onsite and away from the site. These assignments shall cover the emergency functions in Table B-1 entitled, "Minimum On-Site Staffing Requirements for Nuclear Power Plant Emergencies." The minimum on-shift staffing levels shall be as indicated in Table B-1. The licensee must be able to augment on-shift capabilities within a short period after declaration of an emergency. This capability shall be as indicated in Table B-1.

- 10 CFR 50.54(q) establishes requirements that all holders of a nuclear power reactor operating license must follow and maintain in effect emergency plans which meet the planning standards in 10 CFR 50.47(b) and the requirements in 10 CFR 50, Appendix E, *"Emergency Planning and Preparedness for Production and Utilization Facilities."* 10 CFR 50.47 of 10 CFR, *"Emergency plans,"* sets forth emergency plan requirements for nuclear power plant facilities.

- NUREG-0654/FEMA-REP-1, *"Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants,"* provides guidance and acceptance criteria to provide a basis for NRC licensees, State and local governments to develop radiological emergency plans and improve emergency preparedness.

- Regulatory Guide 1.219, *"Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors,"* provides guidance related to emergency preparedness and specifically to making changes to emergency response plans.

- NRC Regulatory Issue Summary (RIS) 2005-02, Revision 1, *"Clarifying the Process for Making Emergency Plan Changes,"* which provides guidance to (1) clarify the meaning of a "decrease in effectiveness," as stated in 10 CFR 50.54(q); (2) clarify the process for evaluating proposed changes to emergency plans; (3) provide a method for evaluating proposed changes to emergency plans; and (4) provide clarifying guidance on the appropriate content and format of applications submitted to the NRC for approval prior to implementation.

- NSIR/DPR-ISG-01, *"Interim Staff Guidance, Emergency Planning for Nuclear Power Plants,"* provides guidance for addressing emergency planning requirements for nuclear power plants. This guidance is based on changes to Emergency preparedness regulations 10 CFR 50.47 and 10 CFR 50 Appendix E, that were

published in the Federal Register (FR) on November 23, 2011 (i.e., reference 76FR 72560). The guidance should be used by licensees and applicants for implementing changes to onsite EP programs based on the revised emergency preparedness requirements and by NRC for reviewing the adequacy of the revised onsite emergency preparedness programs.

In addition, Exelon also reviewed the "Alternative Guidance for Licensee Emergency Response Organizations" (Alternative Guidance) finalized in letter from the NRC to NEI, June 12, 2018 and draft RIS 2016-10, *"License Amendment Requests for Changes to Emergency Response Organization Staffing and* Augmentation" (ML15338A291) in support of this submittal.

Exelon has evaluated the proposed changes against the applicable regulatory requirements and guidance criteria. The proposed Emergency Plan changes continue to assure that regulatory requirements and emergency planning standards associated with emergency response are met.

4.2 Precedent

There is no industry precedent for licensees implementing changes based on the NRC's Alternative Guidance; however, there have been other ERO staffing amendments approved by the NRC within the last few years. Specifically, on March 14, 2017, the NRC approved Southern Nuclear Operating Company's License Amendment Request to standardize the Emergency Plans for the Joseph M. Farley, Edwin I. Hatch and Vogtle Nuclear Plant Stations which included changes to the ERO staffing (ML16141A109). Regarding Exelon stations, a revision to the Three Mile Island Emergency Plan related to ERO staffing was approved by the NRC on June 23, 2017 (ML17137A393).

4.3 No Significant Hazards Consideration

In accordance with 10 CFR 50.90, *"Application for amendment of license, construction permit, or early site permit,"* Exelon Generation Company, LLC (Exelon) requests amendments to the following license:

- DPR-18 – R. E. Ginna Nuclear Power Plant

The requested amendments to the license support changes to the R. E. Ginna Nuclear Power Plant (Ginna) Emergency Plan based upon completion of a supporting evaluation of onsite Emergency Response Organization (ERO) staffing. The proposed changes will help align the Exelon nuclear station's minimum staff ERO with the Alternative Guidance for Licensee Emergency Response Organizations" finalized in letter from the NRC to NEI, June 12, 2018.

The proposed changes have been reviewed considering the applicable requirements of 10 CFR 50.47, 10 CFR 50, Appendix E and other applicable NRC guidance criteria. Exelon has evaluated the proposed changes to the Ginna Emergency Plan and determined that the changes do not involve a Significant Hazards Consideration. In support of this determination, an evaluation of each of the three (3) standards, set forth in 10 CFR 50.92, *"Issuance of amendment,"* is provided below.

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed changes to the Ginna Emergency Plan do not increase the probability or consequences of an accident. The proposed changes do not impact the function of plant Structures, Systems, or Components (SSCs). The proposed changes do not affect accident initiators or accident precursors, nor do the changes alter design assumptions. The proposed changes do not alter or prevent the ability of the onsite ERO to perform their intended functions to mitigate the consequences of an accident or event. The proposed changes remove ERO positions no longer credited or considered necessary in support of Emergency Plan implementation.

Therefore, the proposed changes to the Ginna Emergency Plan do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed changes have no impact on the design, function, or operation of any plant SSCs. The proposed changes do not affect plant equipment or accident analyses. The proposed changes do not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed), a change in the method of plant operation, or new operator actions. The proposed changes do not introduce failure modes that could result in a new accident, and the proposed changes do not alter assumptions made in the safety analysis. The proposed changes remove ERO positions no longer credited or considered necessary in support of Emergency Plan implementation.

Therefore, the proposed changes to the Ginna Emergency Plan do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

Margin of safety is associated with confidence in the ability of the fission product barriers (i.e., fuel cladding, reactor coolant system pressure boundary, and containment structure) to limit the level of radiation dose to the public.

The proposed changes do not adversely affect existing plant safety margins or the reliability of the equipment assumed to operate in the safety analyses. There are no changes being made to safety analysis assumptions, safety limits, or limiting safety system settings that would adversely affect plant safety as a result of the proposed changes. Margins of safety are unaffected by the proposed changes to the ERO staffing.

The proposed changes are associated with the Ginna Emergency Plan staffing and do not impact operation of the plant or its response to transients or accidents. The proposed changes do not affect the Technical Specifications. The proposed changes do not involve a change in the method of plant operation, and no accident analyses will be affected by the proposed changes. Safety analysis acceptance criteria are not affected by these proposed changes. The proposed changes to the Emergency Plan will continue to provide the necessary onsite ERO response staff.

Therefore, the proposed changes to the Ginna Emergency Plan do not involve a significant reduction in a margin of safety.

4.4 Conclusions

In conclusion, based on the considerations discussed above: 1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, 2) such activities will be conducted in compliance with the Commission's regulations, and 3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

The proposed changes are applicable to emergency planning standards for R. E. Ginna Nuclear Power Plant (Ginna) involving proposed ERO staffing changes. The proposed changes do not reduce the capability to meet the emergency planning standards established in 10 CFR 50.47 and 10 CFR 50, Appendix E. The proposed changes do not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in the individual or cumulative occupational radiation exposure. Accordingly, the proposed changes meet the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed changes.

Furthermore, in accordance with 10 CFR 51, additional information is provided below in support of a finding that the proposed changes do not have significant impact on the quality of the human environment.

Pursuant to 10 CFR 50.90, Exelon Generation Company, LLC (Exelon) is requesting amendments to the license for Ginna.

Specifically, the proposed changes would revise certain Emergency Response Organization (ERO) positions to align with the minimum staff ERO guidance specified in the NRC's Alternative Guidance

The proposed changes will also relocate the identified Full Augmentation ERO positions specified in Figure 2-1, *"Minimum On-Site Staff Requirements,"* of each affected station's Emergency Plan to an Emergency Preparedness Implementing Procedure (EPIP).

The proposed changes have been reviewed considering the requirements of 10 CFR 50.47, *"Emergency plans,"* paragraph (b), 10 CFR 50 Appendix E, "*Emergency Planning and Preparedness for Production and Utilization Facilities,"* and other applicable emergency preparedness NRC guidance documents. An evaluation of the proposed changes pursuant to 10 CFR 50.54, *"Conditions of licenses,"* paragraph (q), *"Emergency plans,"* determined that the proposed changes result in a reduction in effectiveness of the Emergency Plans for the affected facilities and, therefore, require prior NRC approval.

Exelon has determined that the proposed changes do not individually or cumulatively have a significant effect on the human environment. The proposed changes update the licensing basis for the Ginna related to ERO staffing consistent with guidance in the NRC's Alternative Guidance. The associated changes to the ERO staffing will not affect the quality of the human environment.

As described above, Exelon has determined that operation of the subject facilities in accordance with the proposed changes does not involve a significant hazards consideration, in that it does not: 1) involve a significant increase in the probability or consequences of an accident previously evaluated; 2) create the possibility of a new or different kind of accident from any accident previously evaluated; or 3) involve a significant reduction in a margin of safety.

Exelon has determined that operation of Ginna in accordance with the proposed changes does not authorize a significant change in the types or a significant increase in the amounts of any effluent that may be released offsite. The proposed changes are unrelated to any aspects of plant construction or operation that would introduce any changes to effluent types (e.g., effluents containing chemicals or biocides, sanitary system effluents, or other effluents) or affect any plant radiological or non-radiological effluent release quantities. Furthermore, these changes do not diminish the functionality of any design or operational features that are credited with controlling the release of effluents during plant operation.

Exelon has determined that operation of the affected facilities in accordance with the proposed changes does not result in a significant increase in individual or cumulative occupational radiation exposure. The proposed changes will not affect how a structure, system, or component will be used to meet the design bases of the nuclear plant. The proposed changes will have no effect on the construction or operation of the nuclear plants and, therefore, would not introduce any changes to the amount of occupational radiation exposure.

In conclusion, Exelon has operational effects of the proposed amendment do not involve 1) a significant hazards consideration, 2) a significant change in the types of or significant increase in the amounts of any effluents that may be released offsite, or 3) a significant increase in the individual or cumulative occupational radiation exposure. Consequently, the proposed changes will not have a significant effect on the quality of the human environment.

6.0 REFERENCES

6.1 NSIR/DPR-ISG-01, *"Interim Staff Guidance, Emergency Planning for Nuclear Power Plants,"* Revision 0, November 2011.

6.2 NEI 10-05, Revision 0, *"Assessment of On-Shift Emergency Response Organization Staffing and Capabilities,"* dated June 2011.

6.3. NUREG-0654/FEMA-REP-1, *"Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants,"* Revision 1, U.S. Nuclear Regulatory Commission and Federal Emergency Management Agency, Washington, DC, November 1980.

6.4 10 CFR 50.47, *"Emergency plans."*

6.5 10 CFR 50, Appendix E, *"Emergency Planning and Preparedness for Production and Utilization Facilities."*

6.6 Regulatory Issue Summary 2005-02, Revision 1, *"Clarifying the Process for Making Emergency Plan Changes,"* dated April 19, 2011.

6.7 Regulatory Guide 1.219, *"Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors,"* dated November 2011.

6.8 R. E. Ginna Nuclear Power Plant, Updated Final Safety Analysis Report (UFSAR).

6.9 Letter from NRC to NEI, “Alternative Guidance for Licensee Emergency Response Organizations”, June 12, 2018.

ATTACHMENT 1A

Emergency Plan Marked-up Pages – R. E. Ginna Nuclear Power Plant

Standardized Emergency Plan EP-AA-1000
and
Emergency Plan Annex EP-AA-1012

Affected Pages

Standardized Emergency Plan EP-AA-1000

Mark-ups

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:

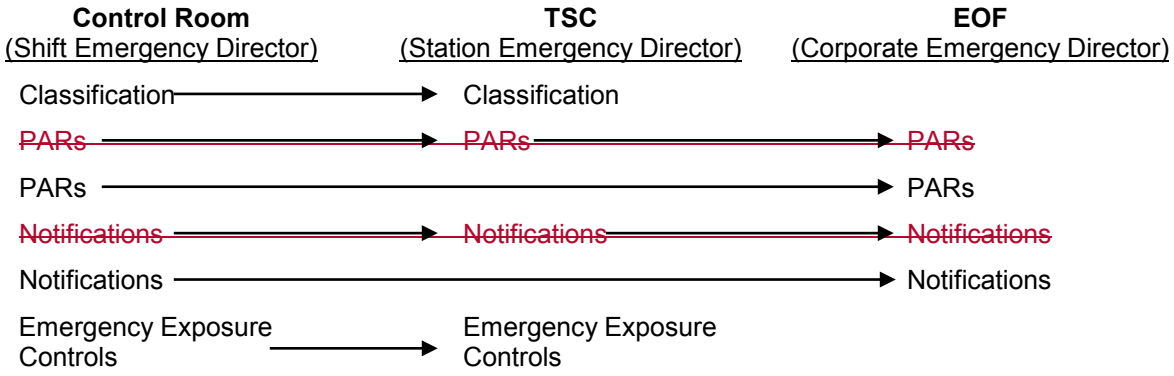
- Event classification.
- Protective Action Recommendations (PARs) for the general public.
- Notification of offsite authorities (approval of state/local and NRC notifications).
- Authorization of emergency exposure controls in excess of 5 Rem TEDE and the issuance of potassium iodide (KI), for Exelon 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 t~~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,~~. T~~t~~he Corporate Emergency Director (EOF) ~~will subsequently relieve the Station Emergency Director (TSC) of overall Command and Control and~~ assume~~s~~ the non-delegable responsibilities for PAR determination and notifications to offsite authorities.

Transition of "Non-Delegable" Responsibilities



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 Communicators ~~CR/~~TSC~~/OSC~~

~~The Communicators are responsible for transmitting/receiving information to and from the TSC, OSC and Control Room. General r~~Responsibilities assigned to the ENS ~~all~~ Communicators 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.

- Assist the Station Emergency Director in evaluating changes in event classification.
- Supervise the activities of the ~~Operations Communicator and 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.

~~6) Technical Manager TSC~~

~~The Technical Manager reports to the Station Emergency Director and directs a staff in performing technical assessments of station emergencies and assists in recovery planning. Responsibilities include:~~

- ~~Accumulate, tabulate and evaluate data on plant conditions.~~
- ~~Evaluate plant parameters during an emergency to determine the overall plant condition.~~
- ~~Coordinate core damage assessment activities.~~
- ~~Identify data points and control parameters that the Operations staff should monitor.~~
- ~~Ensure that current and adequate technical information is depicted on status boards.~~
- ~~Identify and direct staff in the development of special procedures needed to effect long-term safe shutdown or to mitigate a release.~~
- ~~Supervise the total onsite technical staff effort.~~
- ~~Act as the TSC liaison with state and appropriate NRC Site Team representatives.~~
- ~~Assist the Radiation Protection Manager for onsite radiological/technical matters.~~
- ~~Assist the Station Emergency Director in evaluating plant based PARs (prior to Corporate Emergency Director accepting command and control) and changes in event classification.~~
- ~~Supervise the activities of the TSC Technical Communicator.~~

- ~~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 TSC

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 TSC 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~~/I&C~~ 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 affected 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 Emergency Director in the evaluation of the significance of an emergency with respect to the public.

- Notify the ~~EOF~~ 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 JIC.~~
- ~~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 JIC.~~

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 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) 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 Annex~~in 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 Spokesperson~~s~~. 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:

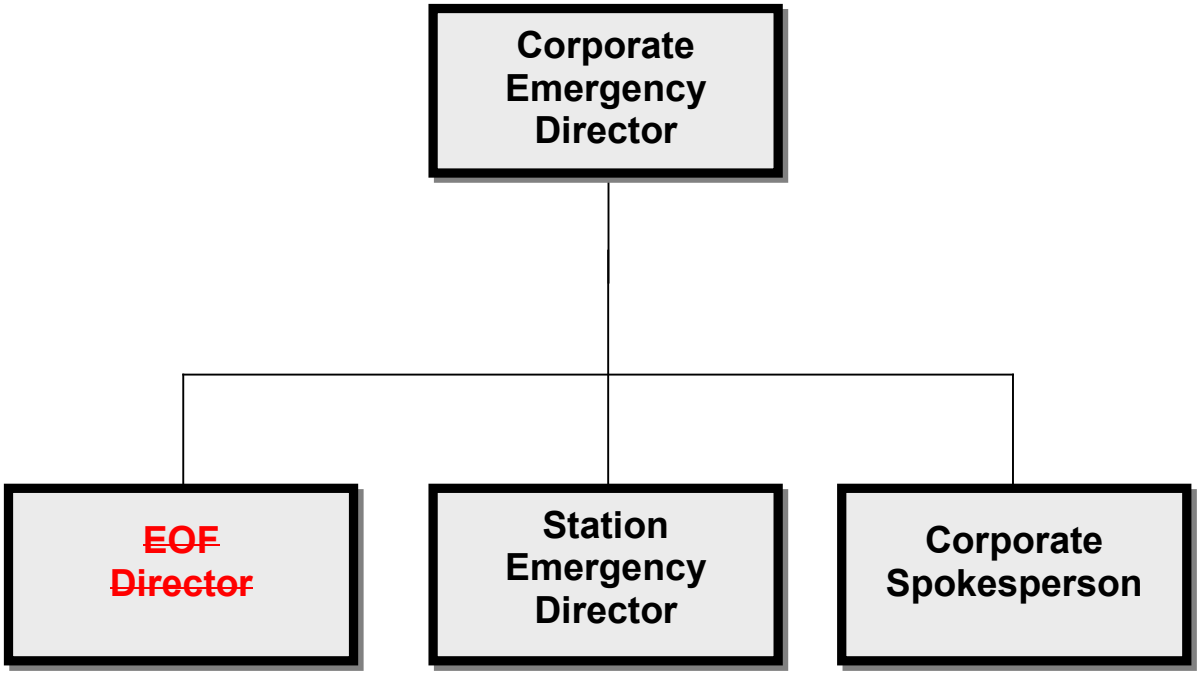
a. Institute of Nuclear Power Operations (INPO): Experience has shown that a utility may need resources beyond in-house capabilities for the recovery from a nuclear plant emergency. One of the roles of the Institute of Nuclear Power Operations (INPO) is to assist affected utilities by quickly applying 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.

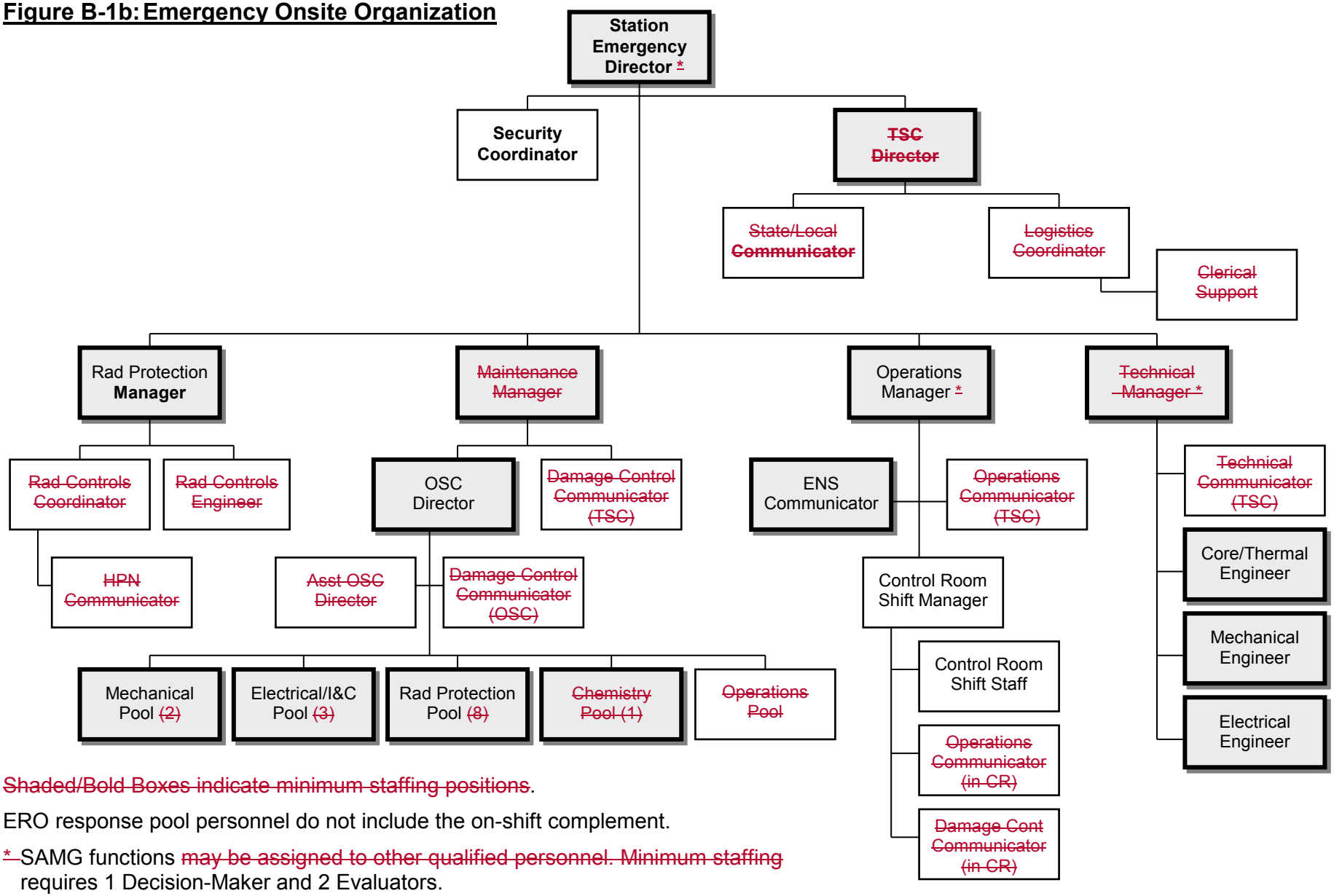
- INPO provides the "Nuclear Network", or its replacement, electronic communications system to its members, participants, NEI, and EPRI to coordinate the flow of media and technical information about the emergency.

Figure B-1a: Exelon Overall ERO Command Structure



~~Shaded/Bold Boxes indicate minimum staffing positions.~~

Figure B-1b: Emergency Onsite Organization

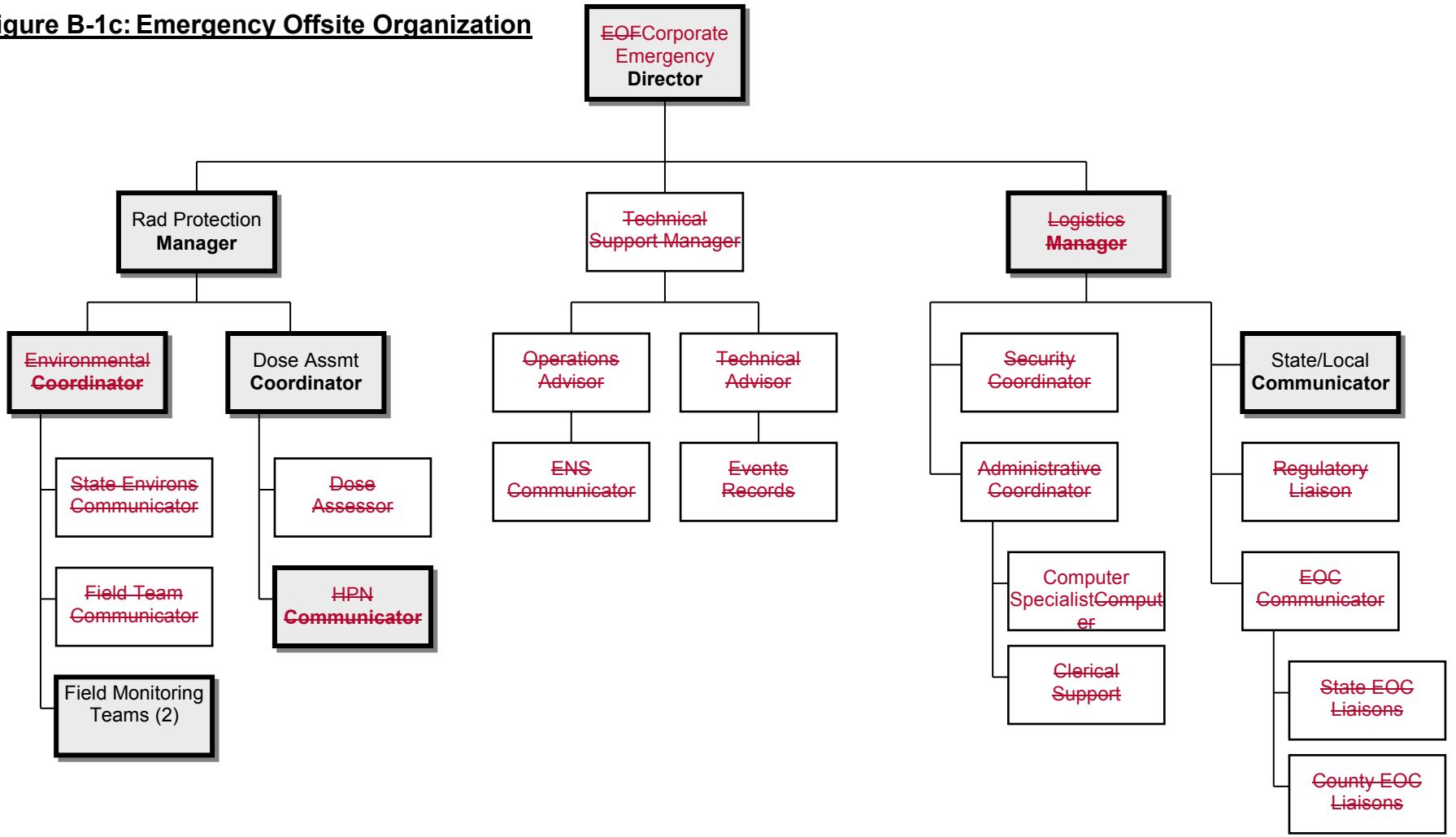


~~Shaded/Bold Boxes indicate minimum staffing positions~~.

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

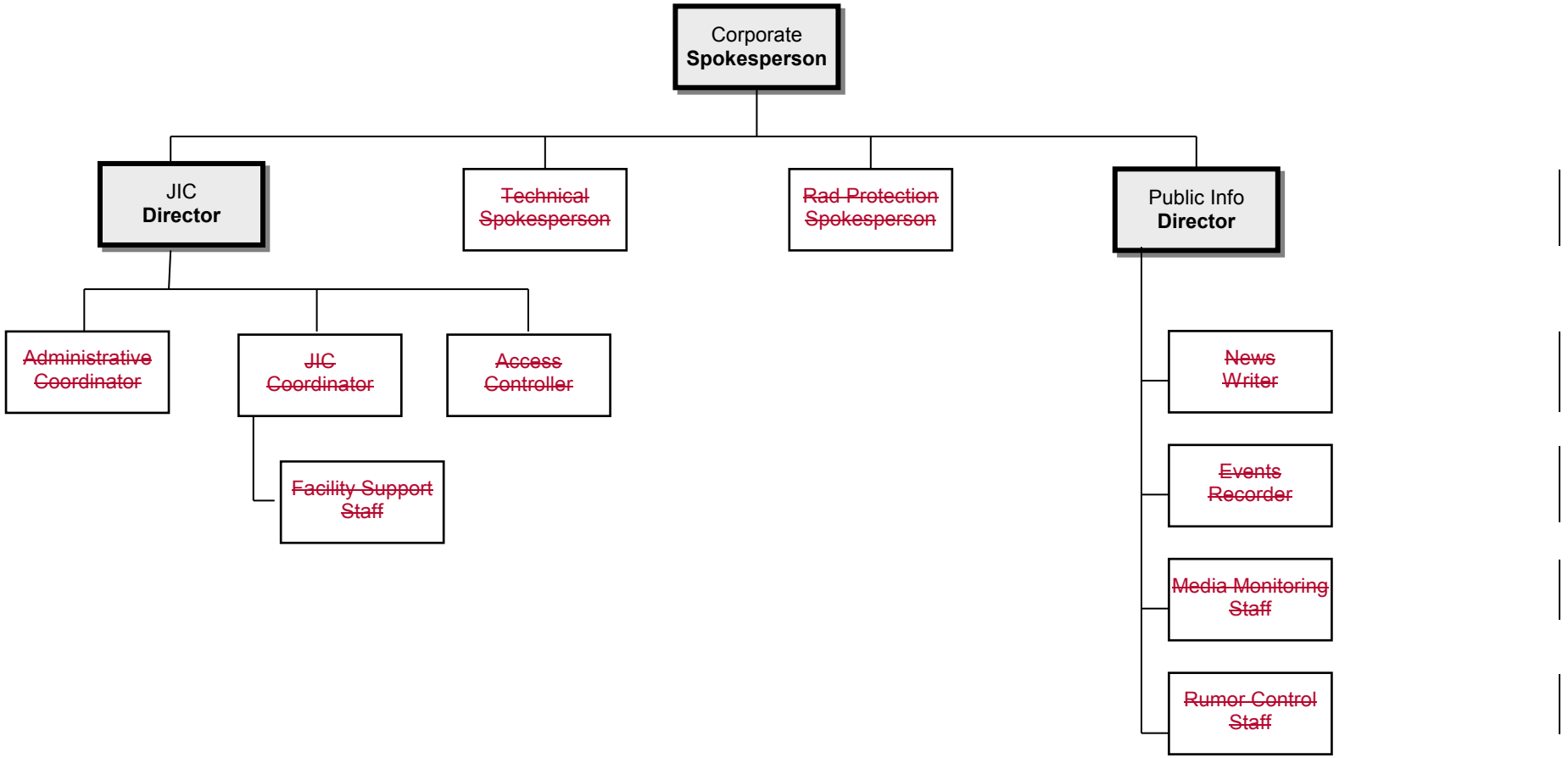
* ~~SAMG functions may be assigned to other qualified personnel. Minimum staffing~~ requires 1 Decision-Maker and 2 Evaluators.

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)

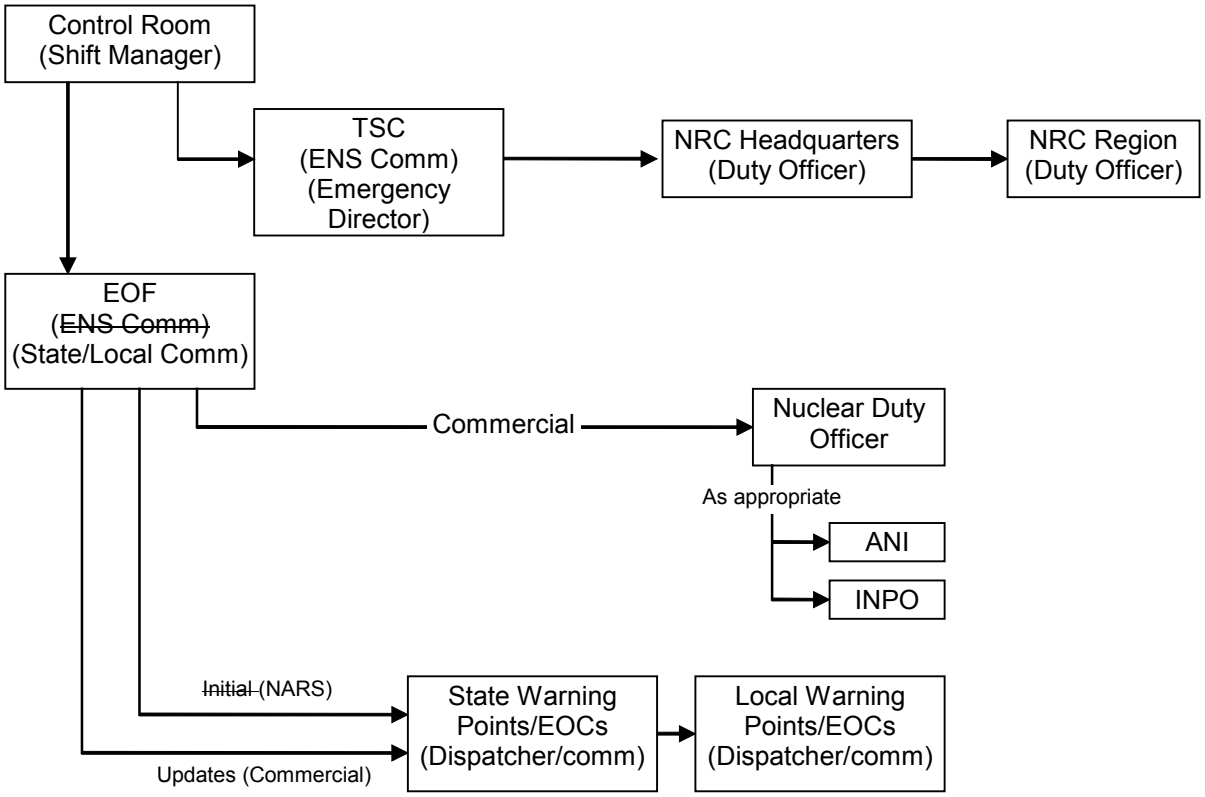
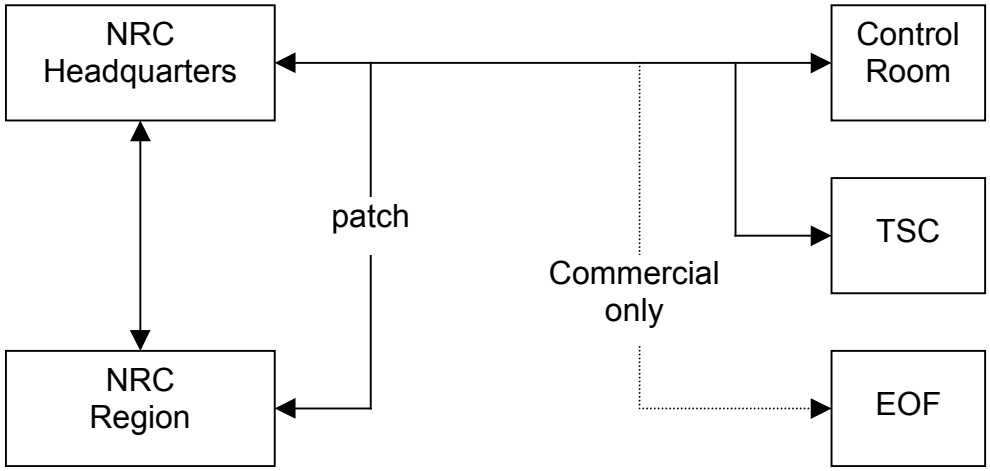


Figure F-3: NRC Communications for Nuclear Response



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.
Command and Control • 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
Communications[3] • 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
Radiation Protection • 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[5]	(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.
Supervision of Radiation Protection Staff and Site Radiation Protection • 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)
Dose Assessments/ Projections • Perform dose assessments/projections and provide input to applicable PAR decision- maker, until relieved.	(1) Shift Dose Assessor [1, 5]	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 • Evaluate plant conditions and recommend emergency classifications, until relieved.	Emergency Classification Advisor[1]	(1) Operations Manager (TSC)	Not applicable	Not applicable
Engineering • Provide engineering coverage related to the specific discipline of the assigned engineer, until relieved.	(1) **Core/ Thermal Hydraulics Engineer - STA**[1] • Evaluate reactor conditions.	**TSC Engineering Staff** • (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)** • 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)** • (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)** • (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	(1) **OSC Director** • Supervise OSC activities as directed by Emergency Coordinator.	**OSC Supervisors** • (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	**Onsite FM Individual** • (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. . **Offsite FMT A** • (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.	**Offsite FMT B** • (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 • Manage and coordinate media information related to the event.	Not applicable	Not applicable	Not applicable	• Corporate Spokesperson • JIC Director • Public Information Director

Emergency Preparedness (EP) Functions	On-Shift	TSC / OSC		EOF/JIC - Alert or Greater[2] Augment w/in 90
		Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	
JIC/EOF Information Technology (IT)	Not applicable	Not applicable	Not applicable	• (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.
5. FitzPatrick only: FitzPatrick will staff one (1) RP Technician on-shift and one additional dedicated person to support on-shift Dose Assessment activities. Note 1 does not apply to FitzPatrick for the on-shift dose assessment function. Additional RP Technician support can be obtained from NMP if needed during an emergency.
6. Ginna Only: Two of the RP Personnel who respond at 90 minutes may be survey task qualified and not require ANSI qualifications.

Emergency Plan Annex EP-AA-1012

Mark-ups

EP-AA-1012
Revision x

EXELON NUCLEAR

RADIOLOGICAL EMERGENCY PLAN ANNEX FOR GINNA STATION

TABLE OF CONTENTS

APPENDICES

ADDENDUMS

Section 2: Organizational Control of Emergencies

This section in conjunction with EP-AA-1000, Exelon Nuclear Standardized Radiological Emergency Plan, describes the Exelon Emergency Response Organization (ERO), its key positions and associated responsibilities. It outlines the staffing requirements which provide initial emergency response actions and provisions for timely augmentation of on-shift personnel when required. It also describes interfaces among emergency response personnel and specifies the offsite support available to respond to the nuclear generating stations. Figures 2.1 ~~through 2.7~~ shows the Inter-relationships of Ginna Station Emergency Response Organizations~~interfaces between and among the ERO functional areas~~.

2.1 On-Shift Emergency Response Organization Assignments

The initial phases of an emergency situation at a nuclear station will most likely involve a relatively small number of individuals. These individuals must be capable of (1) determining that an emergency exists; (2) providing initial classification and assessment; and (3) promptly notifying other groups and individuals in the emergency organization. The subsequent phases of the emergency situation may require an increasing augmentation of the emergency organization.

All Exelon Nuclear stations have the capability at all times to perform detection, mitigation, classification, and notification functions required in the early phases of an emergency.

2.2 Authority Over the Emergency Response Organization

The Emergency Director in Command and Control is the designated Exelon individual who has overall authority and responsibility, management ability, and technical knowledge for coordinating all emergency response activities at the nuclear power station. The Emergency Director will immediately and unilaterally initiate any emergency actions, including providing protective action recommendations to authorities responsible for implementing offsite emergency measures.

The Shift Manager is available at all times to assume the responsibilities of Emergency Director. Qualified individuals are on-call to respond to the TSC and EOF to assume Command and Control responsibilities.

~~2.3 Criteria for Assuming Command and Control (Succession)~~

~~The responsibility for initial assessment of and response to an emergency rests with the Shift Manager (Shift Emergency Director). Emergency personnel assume responsibility for their positions upon receiving notification to activate when an event has been declared.~~

~~The Emergency Director responsibilities are initially assumed by the Shift Manager. If the event is classified at an Alert or Higher level, or the Shift Emergency Director deems it appropriate, the Shift ERO will be augmented by the on-call ERO.~~

~~The Station Emergency Director will report to the TSC and assume the Emergency Director responsibilities to classify and declare emergencies, ensure~~

appropriate evacuation actions for plant personnel, and approve emergency exposures and/or the issuance of KI. The Corporate Emergency Director will report to the EOF and assume the Emergency Director responsibilities to direct and approve offsite emergency notifications to state and local authorities, and to make protective action recommendations to offsite authorities.

The Shift Emergency Director is relieved of Command and Control as soon as possible after the declaration of an Alert or higher classification. Command and Control does not transfer until the following criteria have been met:

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

2.4 Non-Delegable Responsibilities

Functional responsibilities of the Emergency Director that may not be delegated include:

- Event classification.
- Notification of offsite authorities (approval of state/local and NRC notifications).
- Protective Action Recommendations (PARs) for the general public.
- 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.

2.5 Emergency Response Organization Positional Responsibilities

Table 2.1 outlines ERO positions required to meet minimum staffing (within 60 minutes) 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. For extended events (one which lasts for more than 24 hours), actual staffing will be established by the Corporate 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.

The station's ERO consist of three major sub groups reporting to the Corporate Emergency Director:

- Onsite ERO, consisting of Control Room, TSC, OSC and Security personnel. The primary functions of the Onsite ERO is perform mitigative actions and ensure appropriate onsite protective actions are taken.

- ~~Offsite ERO, consisting of EOF staff. The primary functions of the Offsite ERO is to interface with offsite authorities and perform offsite radiological assessment.~~
- ~~Public Information ERO, consisting of JIC staff. The primary function of the Public information ERO is to provide accurate information to the public through News Media.~~

~~2.6 Emergency Response Organization Block Diagram~~

~~Figures 2.1 through 2.7 show the reporting chains and interfaces of the ERO.~~

~~2.7 Corporate Emergency Response Organization~~

~~In the event of a declared emergency at one of Exelon's Nuclear Stations, a Corporate Duty Officer is notified. The Duty Officer will notify senior company management personnel of the event. The Corporate Emergency Director will keep senior management informed of events and any need for assistance.~~

~~Specific departments of the company may be called on to assist as necessary to provide support for logistics, public information, finance, technical issues, etc.. Senior management may assist with interfacing government authorities and other outside organizations.~~

2.3 Augmentation of the Emergency Organization and Interface with Other Plans:

The Ginna emergency organization is augmented by a number of offsite services. Figure 2.1 shows the relationship of non-Company offsite organizations in emergency response. Letters of agreement are referenced in Appendix 2. These agreements are considered valid until changed by the author during the annual review of the Emergency Plan. The authors of the letters of agreement are contacted in person or by telephone and the content of the letters is verified.

Plant procedures contain the phone numbers and alternate means of contact needed to initiate emergency response actions. The communicator will initiate a call to New York State, Monroe County and Wayne County EOC, using the NYS Radiological Emergency Communication System (RECS). During working hours, the EOC staff will respond. During off hours, the County 911 Centers and the State Watch Center will respond for each Emergency Director to RECS calls.

The ERO is alerted by a call from an automated notification system or from the Ginna Control Room. Other offsite assistance, such as Department of Energy – Radiological Assistance Plan (DOE-RAP) team or Westinghouse, is alerted by a call from the Emergency Director or designee to their duty officer at the phone numbers listed in procedures.

2.3.1 State of New York, Wayne and Monroe Counties Emergency Actions:

The Company is responsible for promptly notifying State and county authorities when conditions affect, or may affect, safe plant operations.

The participation of the counties, upon notification of an event involving the general public, is outlined in their Radiological Emergency Plans, which are reviewed in Appendix ~~54~~.

The Office of Emergency Management in each county consists of small administrative staffs and a pool of reserve personnel located throughout the county. Members receive training in monitoring, establishing relocation centers and providing medical attention, food, and lodging for evacuees. Extensive communication resources are available for use by the Local Disaster Coordinators and staff, including a number of radios for contacting the county fire coordinator, the police forces, public works and commercial radio stations. A roster of telephone numbers and contacts is maintained to communicate with agencies on State and local levels. Monitoring teams are available and radiological kits are maintained in shelters and firehouses located throughout the counties.

2.3.3 United States Coast Guard (USCG):

The USCG provides emergency support upon request by Wayne and Monroe Counties, in accordance with the Wayne County Radiological Emergency Preparedness Plan and Monroe County Radiological Emergency Preparedness Plan.

2.3.4 United States Nuclear Regulatory Commission, Region 1, Incident Response (Reference: NUREG-0728, NRC Incident Response Plan):

This NRC Plan describes the notification, communication decision-making and mobilization of the NRC Incident Response Organization in the event of an event/incident related to Ginna Station.

The extent of mobilization will depend upon the emergency classification and associated plant conditions.

The Company will supply whatever support services and resources are needed to maintain Federal assistance.

2.3.5 United States Department of Energy Radiological Assistance Program, Region I, Brookhaven Area Office, Upton, New York (DOE RAP/IRAP):

Since Ginna Station is located in DOE Region I, the Brookhaven Office of the U.S. Department of Energy (DOE) has the responsibility to provide radiological assistance in the event of an emergency. Their principal goal is to be prepared in the event of a major accidental release, or other loss of control of radioactive material. Radiological assistance can be requested at any time by calling and indicating the nature of the incident, the location, and how to contact utility and local authorities in order to coordinate the Department of Energy response.

The assistance includes advice and emergency actions essential for the control of the immediate hazards to health and safety. This preparedness includes plans and procedures for: effective and economic use of resources; minimization of radiation exposure of individuals and the public; prevention of the spread of radioactive materials into the environment; and appropriate countermeasures to control and remove radiological hazards. Large numbers of qualified radiation, nuclear and medical specialists are the principal resource that can be made

Table 2.1: Minimum Staffing Requirements for the ERO

Functional Area	Major Tasks	Emergency Positions	Minimum Staff **	Full Augmentation
1. Plant Ops and Assessment	Control Room Staff	Shift Manager (Shift) Control Room Supervisor (SRO) (Shift) Control Room Operator (RO) (Shift) Auxiliary Operator (AO) (Shift)	1* 1* 2* 4*	
2. Emergency Direction and Control	Command and Control	Shift Manager (Shift) Corporate Emergency Director (EOF) Station Emergency Director (TSC)	See above 1 1	
	Facility Control	TSC Director (TSC) EOF Director (EOF)	1 1	
3. Notification & Comm.	Emergency Communications	Shift Communicator (Shift) State/Local Communicator (EOF) ENS Communicator (TSC) HPN Communicator (EOF)	1* 1 1	 1
	Plant Status & Technical Activities	CR Operations Communicator TSC Operations Communicator OSC Operations Communicator EOF Operations Communicator		1 1 1 1
	In-Plant Team Control	Team Tracker (OSC)		1
	Governmental	EOC Communicator (EOF) State Liaison (EOF) County Liaison (EOF) Incident Command Post Liaison		1 1 2 Note 2

Functional Area	Major Tasks	Emergency Positions	Minimum Staff **	Full Augmentation
4. Radiological Assessment	Offsite Dose Assessment	Shift Dose Assessor Dose Assessor (TSC/EOF)	Note 7 Note 8	 2
	Offsite Surveys	Environmental Coordinator (EOF) Offsite Monitoring Team (EOF)	1 4	
	Onsite Surveys	Shift RP Technician (Shift)	2*	
		Onsite Monitoring Team (OSC)	2	
	In-plant Surveys	RP Technician (OSC)	1	
	Chemistry	Shift Chemistry Technician (Shift)	1*	
		Chemistry Technician (OSC) OSC Chemistry Lead	1 1	
	RP Supervisory	Radiation Protection Manager (TSC) Radiation Protection Manager (EOF)	1 1	
5. Plant System Engineering, Repair, and Corrective Actions	Technical Support / Accident Analysis	Shift Technical Advisor (Shift) Technical Manager (TSC) Electrical Engineer (TSC) Mechanical Engineer (TSC) Core / Thermal Hydraulic Engineer (TSC) Operations Manager (TSC) EOF Technical Advisor (EOF)	1* 1 1 1 1 1 1	
	Repair and Corrective Actions	Maintenance Manager (TSC) OSC Director (OSC) Assistant OSC Director (OSC) Electrical Technicians (OSC) Mechanical Technicians (OSC) I&C Technicians (OSC) Operations Personnel Craft Leads (Elec, Mech, I&C)	1 1 1 1 1 1	 (Note 2) (Note 2) (Note 2) (Note 2) 3 (Note 3)

Functional Area	Major Tasks	Emergency Positions	Minimum Staff **	Full Augmentation
6. In-Plant Protective Actions	Radiation Protection	RP Technician (OSC) RP Lead	3 1	
7. Fire Fighting	--	Fire Brigade (Shift) Fire Brigade Lead (Shift)	(Note 4) 1*	
8. First Aid / Rescue	--	First Aid provided by trained Shift Personnel Rescue support provided by shift personnel or OSC personnel.	Fire Brigade members (3) (collateral duty)	
9. Site Access Control	Security & Accountability	Security Shift Supervisor (Shift) Security Personnel Security Coordinator (TSC)	(Note 5) (Note 5)	 1
10. Resource Allocation and Admin Support	Logistics	EOF Logistics Manager (EOF) JIC Logistics Manager (JIC)	 1	1
	Administration	Administrative Staff (TSC) Administrative Staff (OSC) Administrative Staff (EOF) Administrative Staff (JIC)		2 2 2 (Note 6) 2 (Note 6)
	Facility Operations	Computer Specialist (TSC / OSC) Computer Specialist (EOF / JIC)		1 1
11. Public Information	Media Interface	Company Spokesperson (JIC) Media Liaison (JIC)	1	 1
	Information Development	News Writer (JIC) Technical Advisor (JIC)	 1	1
	Media Monitoring and Rumor Control	MM/RC Coordinator (JIC) Inquiry Phone Team (JIC) Media Monitoring Team (JIC)	1	 2 (Note 2) 2 (Note 2)
	Facility Operation and Control	JIC Manager (JIC) JIC Security (JIC)	1	 1

Functional Area	Major Tasks	Emergency Positions	Minimum Staff **	Full Augmentation
		TOTALS:	Shift staff: 14 Other: 39	34

Notes:

* Minimum Shift Staffing

** Minimum Staff will respond within 60 minutes.

(1) Provided by On-Shift personnel, denoted by an asterisk.

(2) Personnel numbers depend on the type and extent of the emergency.

(3) Craft Lead positions can be filled by senior technicians or craft supervisors.

(4) Fire Brigade per FSAR/Technical Specifications, as applicable. May be a collateral duty.

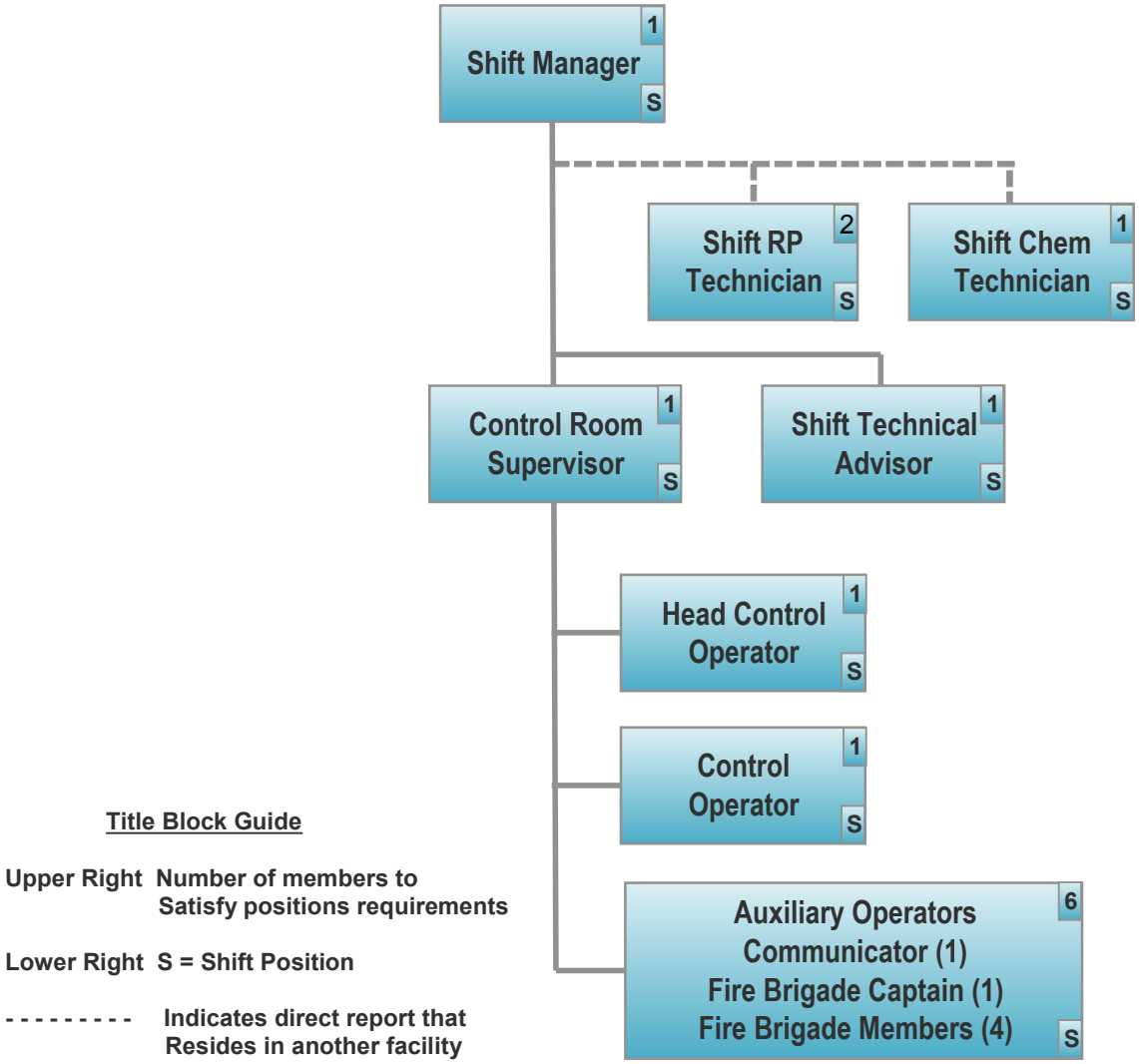
(5) Per Station Security Plan.

(6) EOF and JIC may share Administrative Staffs

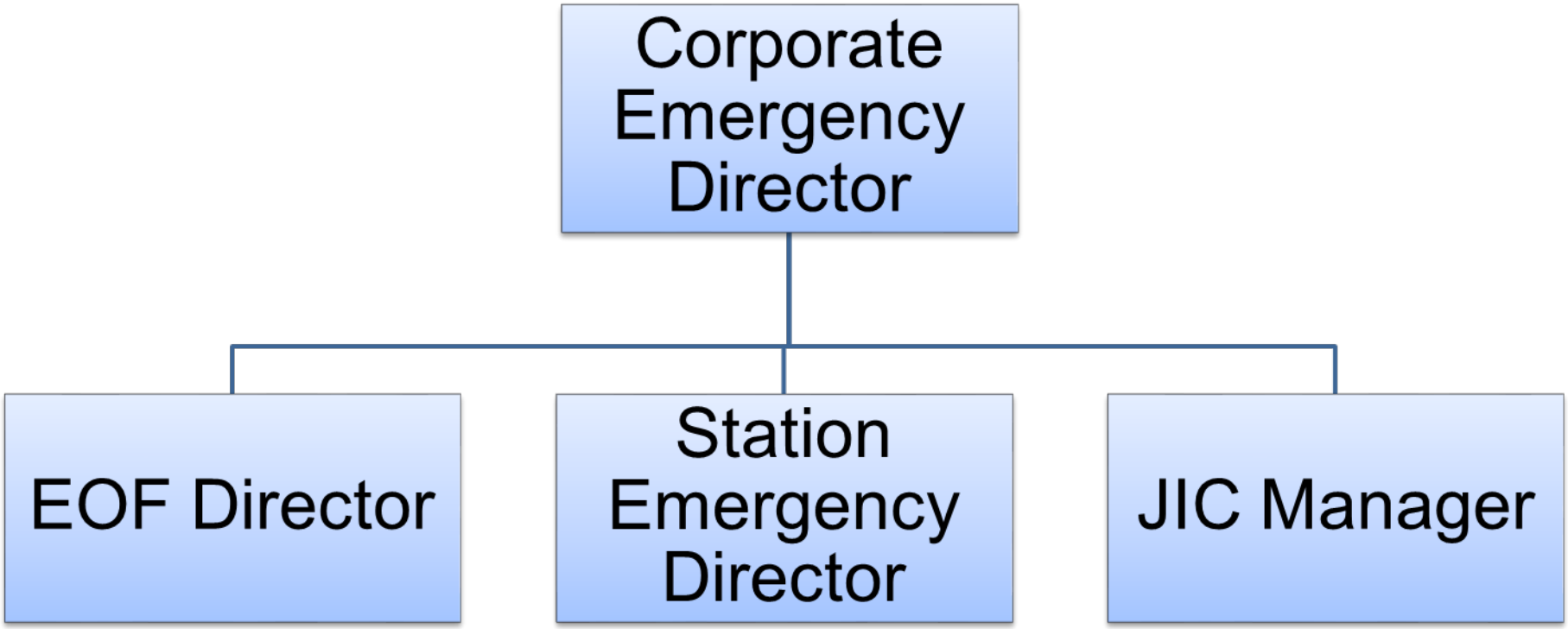
(7) On-shift Dose Assessment function provided by Chemistry Technician as a collateral duty.

(8) Minimum Staff Dose Assessment will be performed by the RPM at the TSC and the RPM at the EOF as collateral duties.

~~Figure 2.1 Shift ERO~~



~~Figure 2.2 ERO Management Structure~~



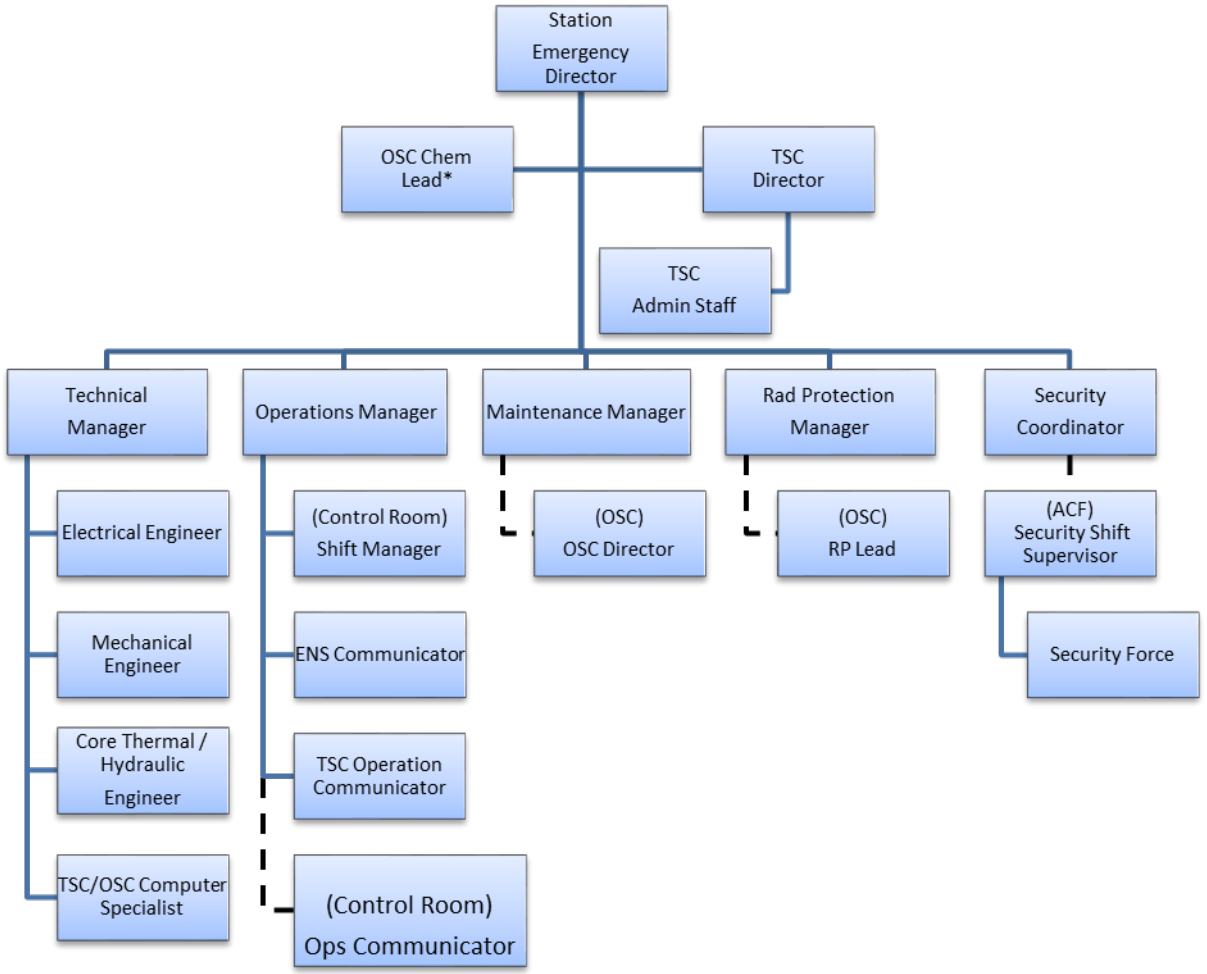
~~**Offsite ERO**~~
~~Interface with Offsite Response Organizations (Federal, State and Local) to coordinate Protective Actions for the public~~

~~**Onsite ERO**~~
~~Onsite (OCA) Protective Response and Mitigative Actions~~

~~**Public Information ERO**~~
~~Provides information to the Public through the News Media, addresses phone inquiries, conducts Rumor Control operations.~~

~~Note: The Emergency Director, with overall Command & Control, is normally located in the EOF.~~

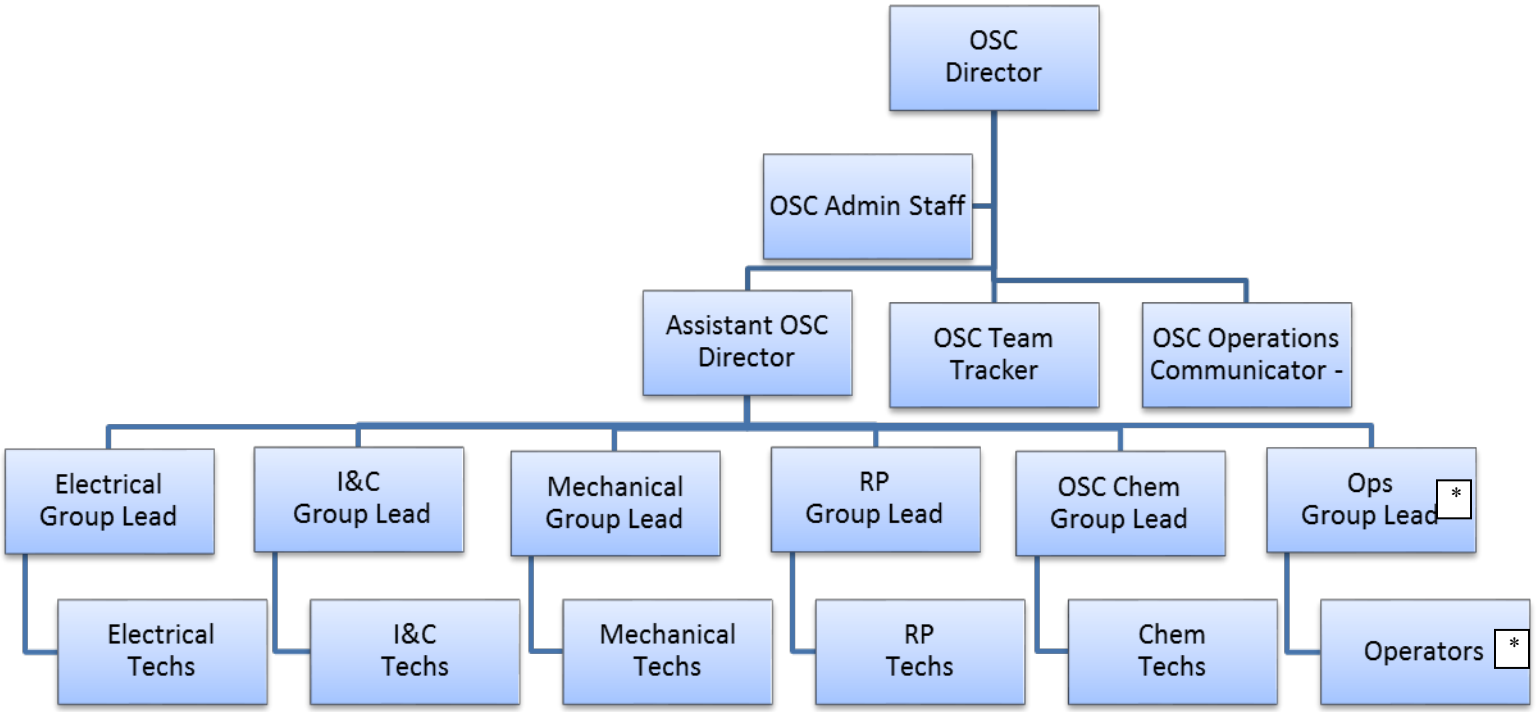
~~Figure 2.3 TSC Staffing~~



~~* OSC Chemistry Group Lead only part of TSC Staffing at UE~~

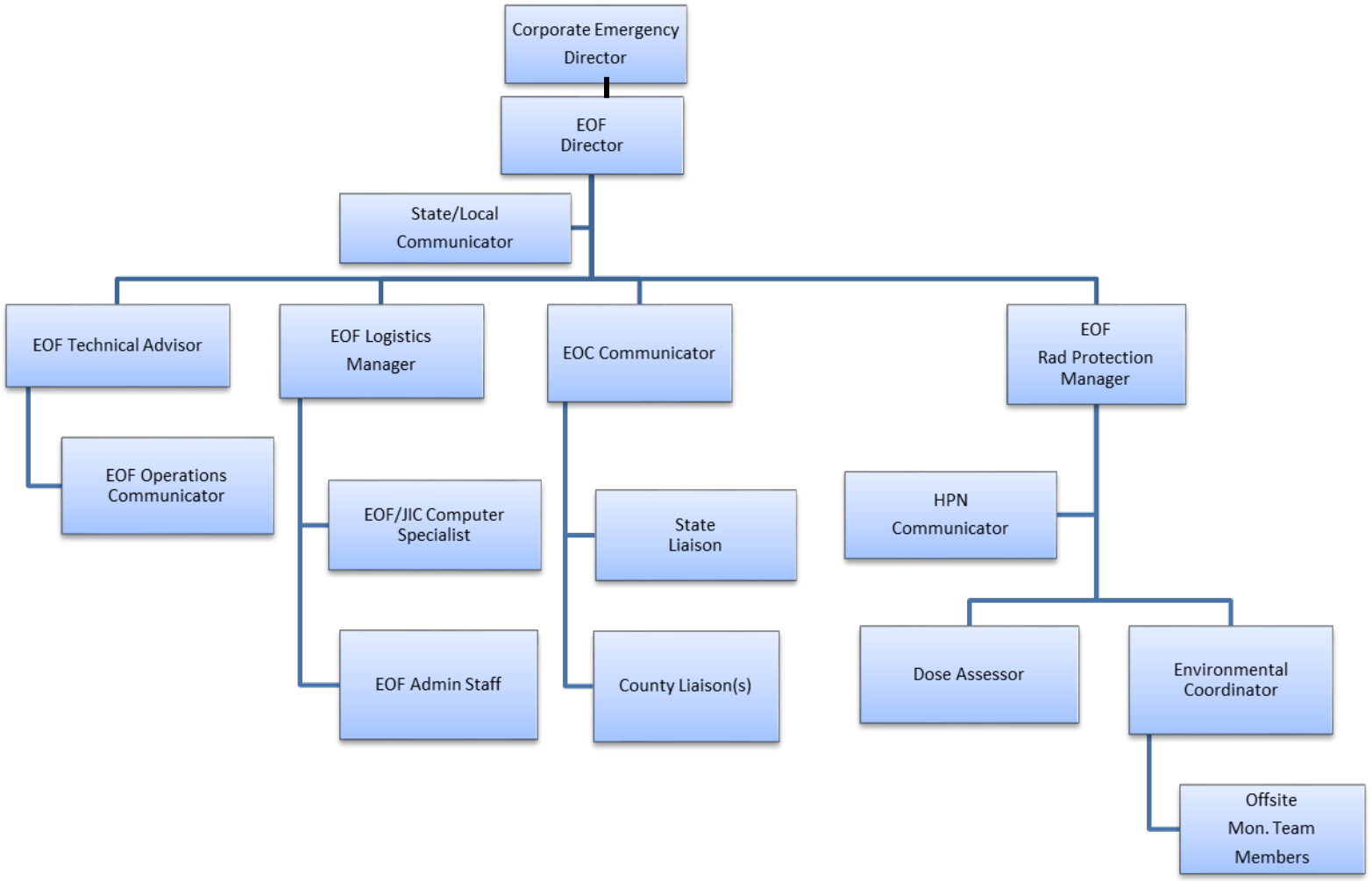
~~Dotted lines indicate positions located in other facilities.~~

~~Figure 2.4 OSC Staffing~~



~~*Minimum number of operators equal to Shift Staffing~~

~~Figure 2.5 EOF Staffing~~



~~Figure 2.6 JIC Staffing~~

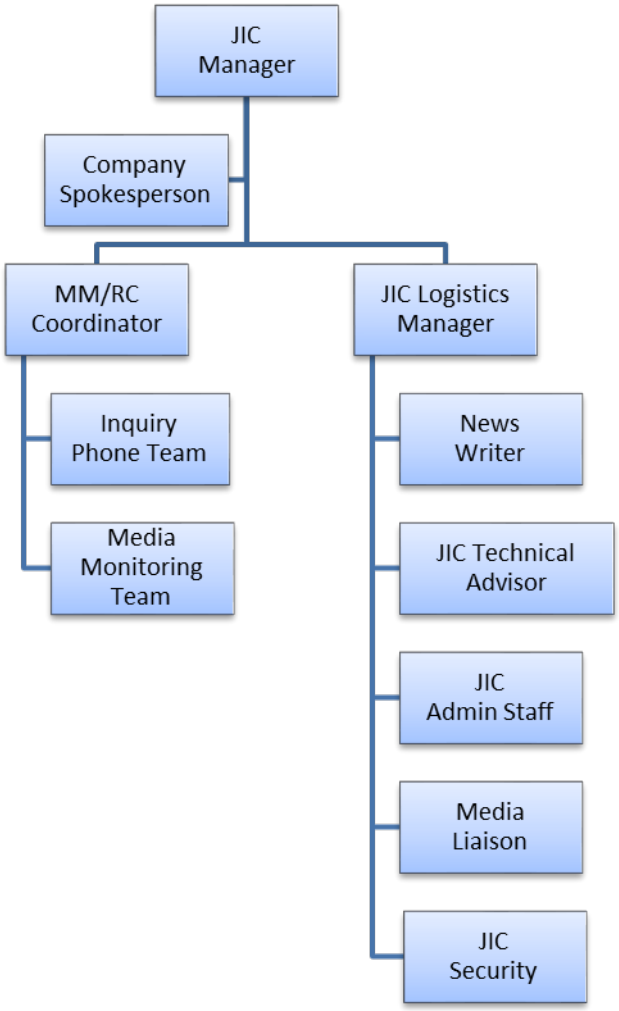
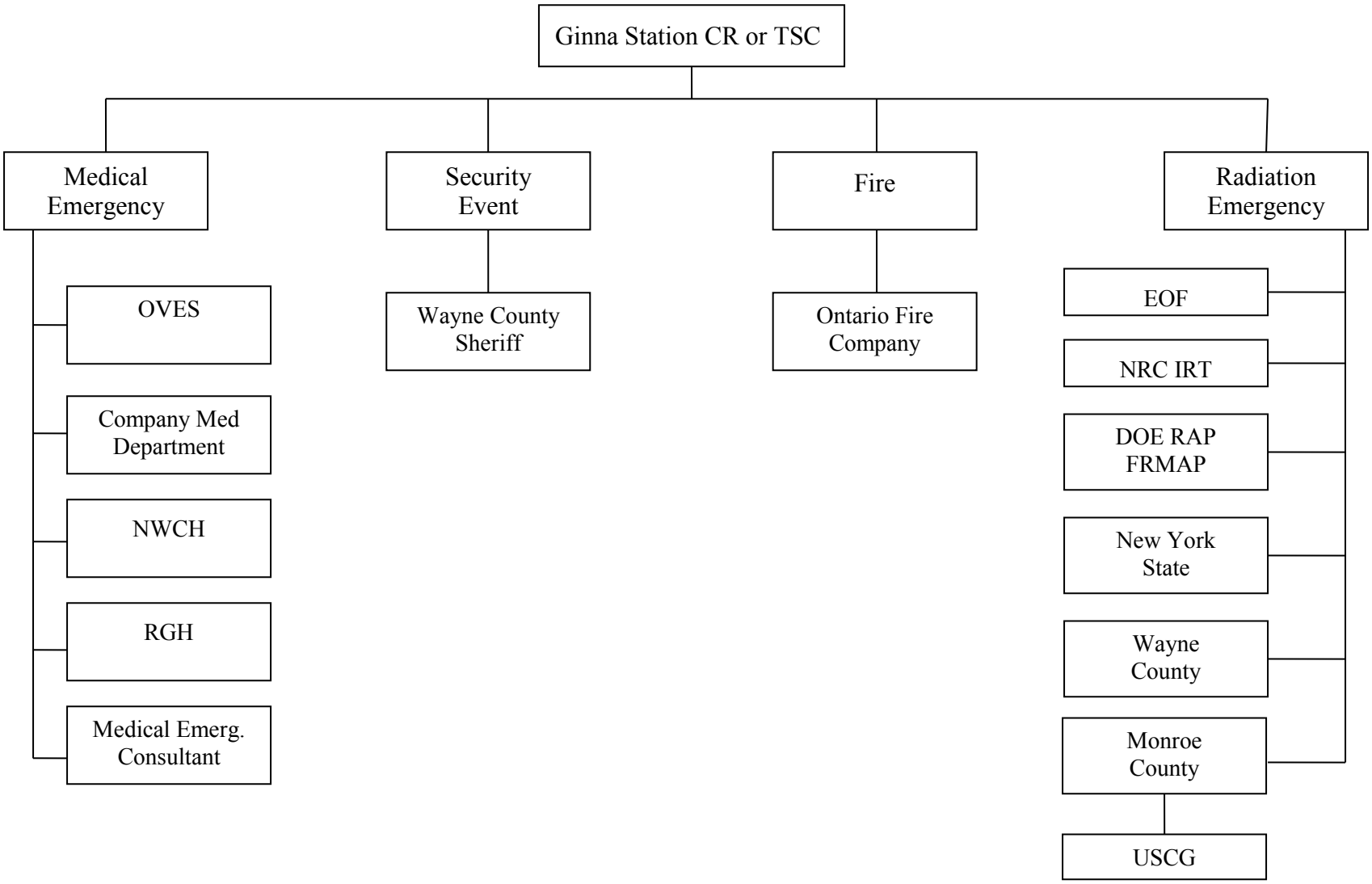


Figure 2.~~7~~ 1 Inter-Relationships of Ginna Station Emergency Response Organizations



NOTE: The following are the four NRC Emergency Classifications.

3.2 Unusual Event:

Events within this Emergency Classification generally characterize off-normal plant conditions which, by themselves, do not constitute significant emergency conditions. Some of these events could, however, indicate a potential degradation in the level of plant safety and/or could escalate to a more severe condition if appropriate action is not taken.

The primary purpose for this classification is to ensure that the plant operating staff recognizes initiating conditions, takes appropriate action, and comes to a state of readiness to respond in the event that the condition becomes more significant. The Unusual Event classification or higher also requires that offsite authorities be promptly informed of the abnormal condition by use of the Radiological Emergency Communications System (RECS) and the New York State Radiological Emergency Data Form, Part I, found in procedure EP-CE-114-100. No response by offsite authorities is necessary for non-hostile action events within this classification. ~~The TSC or EOF will not usually be activated, although the Station Emergency Director, Operations Manager, TSC RPM, and Technical Manager will normally report to the TSC to provide assistance.~~

When giving notice to State and county officials, the Company will make sure that they clearly understand the Unusual Event classification and that, if conditions change, there will be further notification.

3.3 Alert:

This Emergency Classification is characterized by events which indicate an actual or potential substantial degradation of the level of plant safety or a security threat that involves probable life-threatening risk to site personnel or damage to site equipment because of hostile action. This classification requires response by the plant ERO and augmentation of onsite emergency resources. It constitutes the lowest level where emergency offsite response for non-hostile action events may be anticipated.

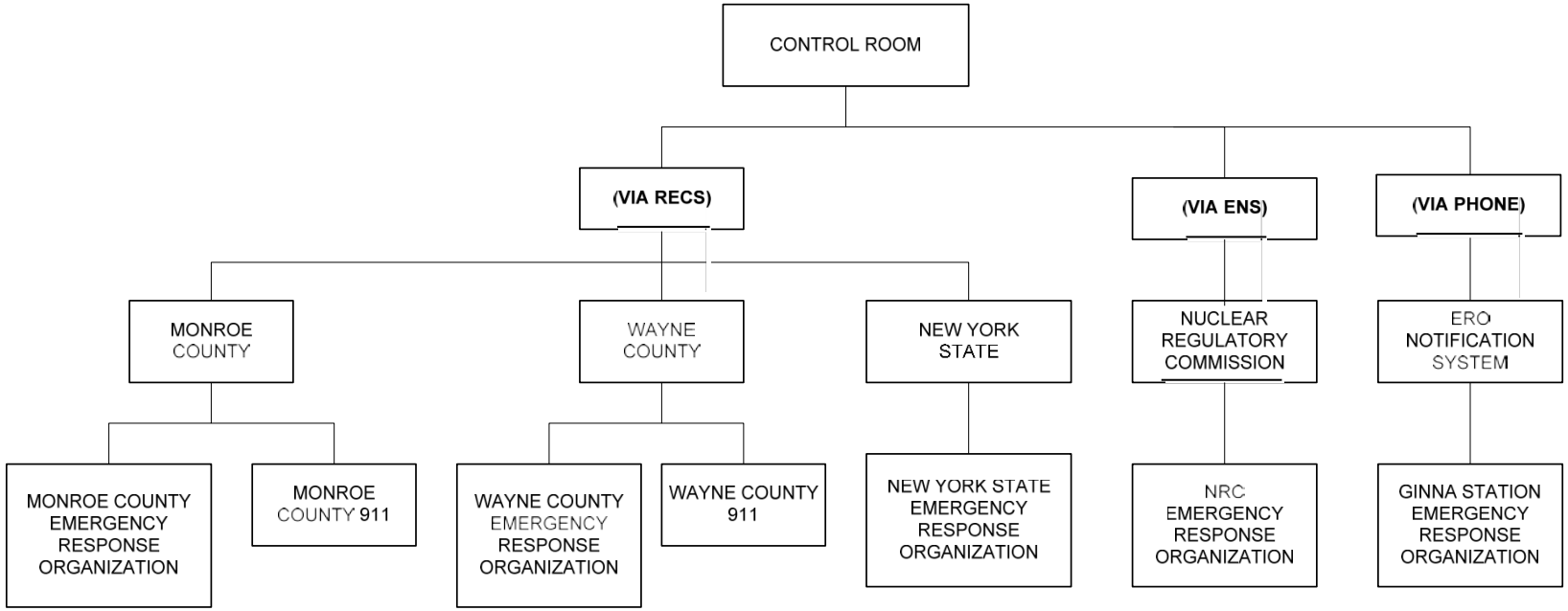
All Ginna emergency facilities will be staffed at an Alert or higher.

Prompt notification of an event within this classification will be made to the NRC, State of New York and Monroe and Wayne Counties. While the initial assessment would not require immediate response, potential releases of radioactivity make it advisable to alert offsite organizations. Periodic status updates will be made to keep authorities aware of the situation.

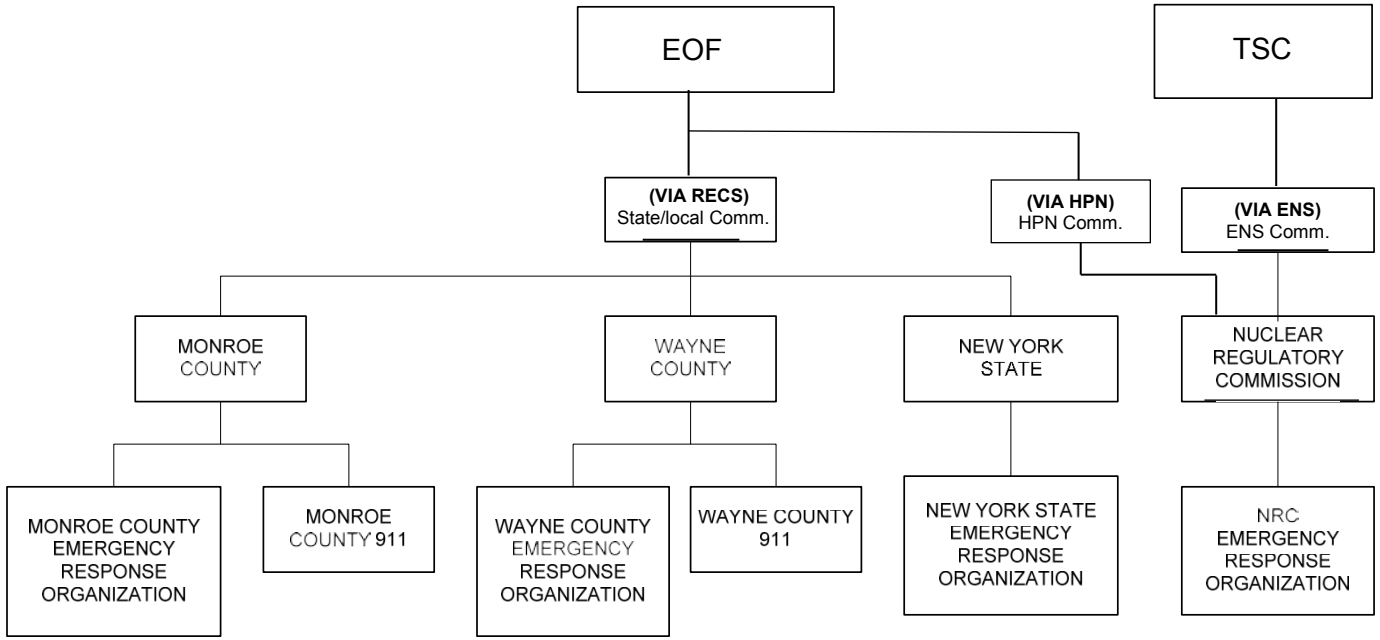
3.4 Site Area Emergency:

A Site Area Emergency is characterized by events involving actual or probable major failures of plant functions needed for protection of the public or hostile action that results in intentional damage or malicious acts: (1) toward site personnel or equipment that could lead to the likely failure of equipment needed for the protection of the public; or (2) that prevent effectives access to equipment needed for the protection of the public. Most events within this classification constitute actual or clear potential for significant releases of radioactive material

~~Figure 4.1 Ginna Notification Process~~



~~Figure 4.1 (Cont'd) Ginna Notification Process (EOF/TSC)~~
~~(Supersedes Standard Plan EP-AA-1000, Figure F-1)~~



Preparedness in Support of Nuclear Power Plants". A summary dose based recommended actions is presented in Table 4.1.

The methodology for implementation of the Protective Action Recommendation (PAR) process is contained in EP-CE-111, Emergency Classification and Protective Action Recommendations, which also provides guidance for upgrading an initial PAR based on pertinent factors.

In making the recommendation for sheltering or evacuation, the EOF Radiation Protection Manager should evaluate the weather forecast in relation to changing winds and precipitation. The offsite authorities should evaluate the calculated evacuation times in relation to predicted start, length and termination of a release.

Emergency staff at Wayne and Monroe Counties and New York State shall determine, by evaluating the information given by the Corporate Emergency Director, if area evacuation or sheltering is necessary, to what extent, and how to undertake protective action including evacuation. A projection of population distribution in the 10 mile plume exposure zone is included in the Evacuation Time Estimates contained in EP-AA-1012, Addendum 2. A summary of evacuation time estimates for various conditions is provided in EP-AA-1012, Addendum 2.

All surveys will be retained by the EOF Radiation Protection Manager ~~and sample analysis results will be retained by the Chemistry Group Lead for appropriate documentation~~. Formal reports shall be written and distributed as required by 10CFR20 and the Ginna Technical Specifications. Information concerning the offsite consequences of the incident and protective actions to protect the public will be coordinated in accordance with the New York State Radiological Emergency Plan and County Emergency Plans. A Company spokesperson in the JIC will release the information concerning the plant, plant safeguards and its employees, and assistance being provided to State and local authorities.

Severe Accident Management Guidelines (SAMG) entry conditions are defined in the Station Emergency Operating Procedures.

4.5.2 Offsite Authorities Actions:

All actions of paragraph 4.9.6 for Site Area Emergency will be reviewed and enacted for a General Emergency. All emergency personnel will have been activated and all response centers are operating. Information is evaluated and forwarded to the proper authorities and the public. Protective actions will be instituted as needed for the public and milk animals.

4.6 Activation of Emergency Response Organization:

Emergency procedures necessary to cope with the plant system malfunction will be implemented. All on-duty operations personnel will report to the Control Room. Control Room ventilation dampers will be switched from outside to inside air and the charcoal filters will be put into service.

Plant Security:

During a plant evacuation, the plant security officers assist in the activation of the plan as follows:

- The Security Shift Supervisor will deploy resources to restrict access to the owner controlled area during an Alert or higher. They will inform the TSC Security Coordinator or Corporate Emergency Director of any security issues.
- At least one security officer will remain in the Access Control Facility to instruct all evacuating personnel leaving the plant to proceed to the Training Center or alternate assembly area until released.

The security officers at the plant entrance will stop all personnel and their vehicles from entering the site and direct them to the Training Center or alternate assembly area until the TSC Security Coordinator or his designee notifies them that the condition has been corrected.

Radiation Protection:

The EOF Radiation Protection Manager shall assist the Corporate Emergency Director in evaluating the emergency. The TSC Radiation Protection Manager will report directly to the Technical Support Center. Other Radiation Protection section personnel will:

a) Report to the Operations Support Center and assume responsibilities as stated in the implementing procedures.

- Radiation Protection personnel shall ensure that dosimeter readings of evacuated personnel who were in radiologically controlled areas of the plant are recorded.
- During off-duty hours, RP technicians shall report to their emergency response locations as stated in the implementing procedures. An on shift RP Technician shall report to the Control Room and provide radiological assessment support as deemed necessary by the Shift Manager.

~~Chemistry:~~

~~The Chemistry Group Lead shall assist the Shift Emergency Director and the Corporate Emergency Director in evaluating the emergency. The Chemistry Group Lead compares plant effluent monitors to release rate limits. The Chemistry Group Lead will report directly to the Operations Support Center.~~

Off-Duty Personnel:

Off-duty personnel, upon notification, shall report to their emergency response locations, unless directed to their Alternate Facility.

4.7 Immediate Assessment:

The Shift Emergency Director (Shift Manager) shall immediately assess the incident. The Shift Emergency Director is responsible for the implementation of the Emergency Plan until command and control is transferred. The Shift Emergency Director will evaluate plant conditions by checking control and safeguards systems, plant data and radiation monitors. The Shift Emergency

Director shall ensure all offsite agencies are notified in accordance with EP-CE-114-100and that the following information is given:

a) Name of facility and communicator

b) Date/time of incident

c) Class of Emergency (Unusual Event, Alert, Site Area Emergency, General Emergency)

d) Brief Description of Event

e) Radioactive Material Release (None, Atmospheric, Ground, Lake)

f) Protective Actions Recommended for appropriate population

g) Temperatures and wind speed and direction

The Wayne County Emergency Management Office and the Monroe County Office of Emergency Management will be notified at the same time through the use of the New York State Radiological Emergency Communications System (RECS). An Emergency Communicator is part of each shift and will maintain contact with New York State and the counties during an emergency. As the RECS line is a closed system, call-back verification by the State and counties is not necessary. The Communicators will also maintain communications with the NRC via the Emergency Notification System (ENS).

If necessary, the Shift Emergency Director shall issue radiation protection equipment and dispatch an RP Technician team to conduct in-plant or area surveys. Prior to augmentation, the Ginna RP Technicians are dedicated to on-site activities. If necessary, a relief schedule will be determined. (See Radiation Protection During an Emergency, Section 4.9.1).

4.8 Subsequent Actions:

To ensure that immediate and direct action is taken in an emergency situation, the Technical Support Center, Operations Support Center and the assembly area in the Training Center or Warehouse will be staffed. Details for staffing are in the implementing procedures. During normal working hours, individuals assigned to the Technical Support Center and the Operations Support Center will go there directly.

During off-duty hours, upon notification of an emergency through the call out procedure, personnel may report to the TSC and OSC using normal procedures unless directed to their Alternative Facility.

The Station Emergency Director shall assume responsibility for the activation of onsite Emergency Centers and establish contact with the Control Room. The Station Emergency Director will request from the on-duty Shift Manager an evaluation of plant conditions and all data which has been relayed to the state in preparation for assuming command and control.

The EOF ~~Environmental Coordinator~~Radiation Protection Manager will offsite dispatch monitoring teams to areas of concern and request each team to report by telephone or radio.

The Corporate Emergency Director will report conditions to company management.

The Corporate Emergency Director will evaluate radiological data and plant parameters. Current conditions and follow-up actions will be reported to management periodically. The New York State officials and Monroe County and Wayne County Directors of Emergency Management will be kept advised of changing conditions. ~~Responders are assigned as the Ginna Liaisons at the State and County Emergency Operating Centers to provide information and data to offsite agency officials.~~

Follow-up messages to offsite authorities will contain the following information as appropriate:

a) Location, name of caller

b) Class of emergency and date and time of incident

c) Type of actual or projected release, estimated duration and impact time

d) Estimated quantity of release for various materials

e) Chemical and physical form of release material (noble gases, iodine, particulate)

f) Current weather conditions

g) Actual or projected dose rate and time integrated dose at site boundary

h) Projected dose rate and integrated doses in affected sectors

i) Estimation of any surface radioactive contamination

j) Recommended emergency response actions or protective measures

k) Prognosis for course of the event

l) Status of in-plant emergency actions, and licensee response

m) Request for further support

The Emergency Medical Plan will be instituted, if necessary. The Shift Emergency Director shall be provided with any survey data necessary to meet his/her responsibilities.

The Corporate Emergency Director will determine if additional personnel should be called to the plant to cope with emergency conditions.

Personnel and cars shall be monitored and surveyed to assess the extent of contamination before leaving the site unless personnel safety or emergency actions require immediate response. All non-essential personnel should be allowed to leave the site.

4.9.4 Search and Rescue:

Following site evacuation, all personnel will be accounted for using security records, sign-in sheets, log sheets, etc. If individuals are not accounted for, the Station Emergency Director will initiate search and rescue operations to locate unaccounted for individuals.

The search and rescue team will consist of at least two persons including a Radiation Protection technician.

The search should start at the last known location or work assignment of the unaccounted-for individual. Radiation surveys should be made as the team progresses. It may be necessary to administer first aid to the individual after he or she is located. The Corporate Emergency Director~~, TSC Director~~ Station Emergency Director. or Control Room shall be advised of the situation.

4.9.5 Decontamination:

A Radiation Protection procedure provides guidance for graduated measures to be used for decontamination. The objective of decontamination is to prevent the spread of radioactive material on the individual, to the environment or to other personnel and to reduce the resultant dose. Decontamination is essentially the removal of radioactive material and is performed starting with the highest level of contamination using the simplest procedures. Continued decontamination may show diminishing effectiveness and require a decision to stop or use more potent agents.

Decontamination kits, which contain items to decontaminate the skin and for wound cleansing, are available. Decontamination should continue until it is no longer effective but not so as to abrade skin. This procedure should be effective against iodine and other contaminants.

If personnel cannot be decontaminated to the limits of Procedure RP-AA-350, “Personnel Contamination Monitoring, Decontamination and Reporting”, Radiation Emergency Assistance Center/Training Site (REAC/TS) may be contacted.

Instruments are available to determine contamination levels of personnel or equipment and the effectiveness of decontamination. Waste drums are available as containers for radioactive waste and emergency clothing is available, if needed.

4.9.6 Offsite Authorities Actions:

Offsite authorities will provide assistance as needed to protect the public. In the event a Site Area Emergency is declared, this may include activating the public notification system and providing information and periodic updates of the situation through the EAS (Emergency Alert System) and/or press briefings. Resources at primary response centers will be augmented by calling other emergency services to standby status and dispatching certain emergency personnel to initiate their functions (i.e., monitoring and communications). Information from the licensee, monitoring teams and weather stations will be continually evaluated with regard to changes in protective actions already

4.11 Public Relations:

Public information will be released by a Company spokesperson operating from the Joint Information Center. Public information personnel will be assisted by a ~~Technical Advisor~~JIC Director who keeps in contact with the Corporate Emergency Director and EOF operations. Company personnel will exchange information with government Public Information officers on a timely basis. All news releases will be coordinated among Federal, State, County and Company sources.

The Company communications department will be notified of any activation of this plan beginning at the Unusual Event classification level. Initial notification at the Unusual Event will be from the Control Room using an automated notification system. Instructions for notifying public information personnel at higher classifications are contained in EP-CE-114-100, Emergency Notifications.

The Joint Information Center will be activated during a nuclear emergency at an Alert or more severe event. The Emergency Plan Implementing Procedures provide for staffing this Center and outline the duties of various positions. Individuals who are qualified to assume these positions are designated. Space is allocated in the Joint Information Center for use by various regulatory and government officials to coordinate and facilitate the flow of accurate information to the public. A Company spokesperson who has access to the EOF will be available to the news media for briefing and questions.

Information concerning plant employees is available through the Public Inquiry function located in the Joint Information Center.

Information concerning the status of the plant, employees and Protective Action Decisions is released by the public information officers representing the Company and Federal, State and local governments.

A public information program to acquaint the public with the proper actions to be taken in the event of a nuclear emergency at Ginna Station will be implemented on an annual basis. This program will provide information about radiation, protective actions which can be taken, suggested evacuation routes, assistance for those with special needs, proper responses to warning signals, and where additional information can be obtained. The program will be coordinated between Company, State and county officials, and consists of items such as printed calendars, brochures and, for Wayne County only, telephone directory instructions.

Material for placement in parks, motels and retail establishments to which transients have access will be provided on an annual basis.

An annual briefing and training session will be held to acquaint the news media with the Ginna Nuclear Emergency Response Plan and related government agency emergency plans. Information on plant operation, radiation effects and concerns, the implementation of our Emergency Plan, points of contact for the release of public information at the Company and other relevant topics will be kept current through these sessions.

If no release data is available, a method for assessment of release rates is used in conjunction with the X/Q values and offsite concentrations. The release rate of radioactive material from the plant can be calculated from the measured airborne concentration at a given downwind sample location and the X/Q value for that location. Field Team survey results can be used to back calculate doses at the site boundary and offsite.

The Manual of Protective Action Guides and Protective Actions for Nuclear Incidents (EPA 400-R-92-001), NUREG-0133, Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants (October 1978) and Regulatory Guide 1.109 Rev. 1, Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluation Compliance with 10 CFR Part 50, Appendix I (October 1977) provide the methodology for relating radiological measurements in various environmental media or effluent monitor readings to offsite dose or dose rates. Meteorological conditions can be factored into these calculations.

A computer program operating on a personal computer is available in the Control Room, ~~TSC~~ and EOF. This system provides multiple methods of calculating downwind dose rates and airborne contamination levels.

The sophisticated computer program, which uses the methods for environmental dose calculations required by Federal regulations, is also available to assess doses during and after an emergency. Additional information on the radiological consequences of a variety of accidents can be found in Chapter 15 of the Ginna Updated Final Safety Analysis Report.

External dose or dose rates from surface contamination or airborne radioactivity are determined by direct field measurements (dosimeter or survey meter). Internal dose commitments from key isotopes via water or airborne pathways would be evaluated using the uptake rates, dose conversion factors, and other pathway parameters given in EPA 400, NUREG-0133 and Regulatory Guide 1.109. Computer software is available that uses these dose calculation models to determine the radiological dose assessment. In this manner, rapid determination of dose estimates from multiple pathways may be made for comparison with protective action guides.

A 1000-gallon holding tank is available to contain decontamination water from a sink and shower located at the Training Center. Decontamination water will be sampled prior to transfer, treatment or disposal.

5.4.6 Protective Equipment and Supplies:

Personnel entering the Controlled Area may be required to wear protective clothing. The nature of the work to be done governs the selection of protective clothing to be worn by individuals. The protective apparel available is shoe covers, head covers, gloves and coveralls. Additional items of specialized apparel such as plastic suits, face shields, and respirators are available for operations involving high levels of contamination. In all cases, Radiation Protection personnel shall evaluate the radiological conditions and specify the required items of protective clothing to be worn.

Respiratory protective devices are required wherever an airborne radiation area exists or is expected. In such cases, Radiation Protection personnel monitor the airborne concentrations and specify the necessary protective devices according to concentration and type of airborne contaminants present.

Available respiratory devices include full face air purifying respirators (filter type both negative and pressured powered air purifying units). Air-line supplied respirators of pressure demand type are used as well as constant flow hoods. Self-Contained Breathing Apparatus devices, using full face masks and pressure demand regulators, are also available.

Site specific ERO Respirator qualification requirements contained in the ERO Training and Qualification procedure take precedence over requirements contained in the Exelon Standardized Radiological Emergency Plan for Ginna Station.

For use in an emergency, equipment and supplies are located in the Control Room, Technical Support Center, and the Training Center. Equipment categories are given in 5.1.8.

5.4.7 Emergency Vehicles:

In the event it becomes necessary to make use of automotive equipment, a number of vehicles will be available. These include a variety of company-owned vehicles assigned to the Station. Lastly, a large and diverse fleet of vehicles is available from the Company vehicle fleet.

5.5 First Aid and Medical Facilities:

First aid and medical provisions include both onsite and offsite facilities. The latter are described in Section 2.~~8~~3, Augmentation of the Emergency Organization. A dispensary onsite contains sinks, a bed, a stretcher, and miscellaneous first aid equipment and supplies. Decontamination supplies can be obtained from the Radiation Protection group. Personnel decontamination supplies and bioassay collection kits are available at Rochester General Hospital and Newark-Wayne Community Hospital.

Auxiliary Operators are trained in first aid procedures using Red Cross Multi-Media or an equivalent program. An administrative procedure establishes a First Aid Team and the actions to be followed in the event of illness or injury at Ginna Station.

Section 6: Maintaining Nuclear Emergency Preparedness

Formalized training program(s) have been established to ensure that all personnel who actively participate in the Nuclear Emergency Plan maintain their familiarity with the plan and their required response. A radiation emergency exercise shall be conducted at least annually, with emphasis placed upon orderly implementation of the emergency plan.

It is the Company management's expectation that responders will respond immediately upon being notified and not wait for additional time. This expectation is reinforced as part of the responder training.

Personnel trained for onsite response to a radiation emergency are part of the regular plant staff and are trained to specific responsibilities within the emergency organization. Training is documented by the Manager, Emergency Preparedness and the Emergency Preparedness Staff. Any emergency plan work by consultants will be under the control of, and reviewed by, the Manager, Emergency Preparedness.

Exercises shall be evaluated by the Manager, Emergency Preparedness and reviewed by the Emergency Preparedness Station and Corporate Management, thereby assuring the effectiveness of the plan throughout the lifetime of the R. E. Ginna facility.

6.1 Training and Drills:

Training classes on the emergency plan shall be conducted once per calendar year not to exceed 18 months between training sessions for all Ginna emergency response personnel who may actively participate in the radiation emergency plan. Details of the training programs are established in Exelon ERO Training and Qualification procedure. Training will include a demonstration of their ability to perform the functions to which they may be assigned by participating in a Drill or Exercise at least once every two years. During drills, on-the-spot corrections of erroneous performance may be made, followed by a critique or corrective action.

Provisions must be made to start a drill or exercise between 6:00 p.m. and 4:00 a.m. at least once in every eight-year cycle. Some drills or exercises should be unannounced.

Specialized training will be provided for:

1. Technical Support Center assignees
2. Operations Support Center assignees
3. First Aid Teams
4. Offsite/Onsite Field Monitoring Personnel~~Teams~~
5. Emergency Operations Facility personnel
6. Security personnel
7. Local Emergency Support Services personnel
8. Fire Brigade personnel
9. Dose Assessment personnel

10. Core Damage Assessment personnel
11. JIC personnel
12. On-Shift Radiation Protection technicians
13. Onsite Field Monitoring Personnel
~~13~~14. Severe Accident Management Evaluators and Decision-Makers

6.1.1 Emergency Director:

Training of Emergency Directors will be given annually to the personnel who fill the Corporate, Station, and Shift Emergency Director positions. This training will cover responsibilities, communications, emergency classifications, protective action recommendations, and review of all procedures pertinent to their respective duties under the Emergency Plan. The necessary lesson plans and training documents are developed in accordance with Exelon procedures and processes.

6.1.2 Offsite/Onsite Monitoring Teams:

Field Monitoring Team Training will be given to selected personnel. Training material will cover Radiation Protection practices and techniques utilized during radiation monitoring, Field Monitoring Team equipment and its use, radio communication techniques, monitoring and sampling procedures, survey routes and sample points, contamination and decontamination considerations, and review of implementing procedures used by Field Monitoring Teams. Field training will be given as needed.

6.1.3 Special Training for Participating Agencies:

Annual training will be provided to offsite support agencies, State and counties on EALs/PARs and other pertinent topics.

Training shall also be provided at least annually for but not limited to the following groups:

a) Ontario Volunteer Fire Company
b) Ontario Volunteer Emergency Squad
c) Rochester General Hospital
d) Newark-Wayne Community Hospital

Training for these groups consists of lectures concerning their required involvement during radiation emergencies, procedures for notification, and basic radiation protection.

6.1.4 Drills and Exercises:

The ERO Training and Qualification procedure establishes the training program which develops and maintains the proficiency of emergency response personnel. This program meets the requirements of 10CFR50 Appendix E Section IV F regarding responding to emergencies. Through the initial training program and annual drills, personnel will be familiarized with the intent of the plan and the content of implementing procedures. Key personnel will be trained in the specific

- Emergency Response Organization (ERO) - Organization put in place to respond to declared events. The ERO replaces normal plant organization when activated and remains in control until the event is terminated. The ~~full~~ ERO is made up of the following sub-groups:
  - On-Shift Personnel - minimum number of shift personnel filling positions identified in Shift Staffing Assessment.
  - Minimum Staffing - The minimum number of ERO members that must be staffed within one hour whenever the Technical Support Center, Operations Support Center, Emergency Operations Facility and the Joint Information Center are required to activate. ~~These positions and number of individuals filling them are identified in Table 2.1.~~
  - ~~Full Staffing: Total members of the ERO including Shift Personnel, Minimum Staff personnel and augmented staffing. Full Augmentation positions and number of individuals filling them are identified in Table 2.1.~~
- Hostile Action - An act toward a nuclear power plant or its personnel that includes the use of violent force to destroy equipment or take hostages, and/or that intimidates the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, projectiles, vehicles or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. Hostile action should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the nuclear power plant. Non-terrorism-based Emergency Action Levels (EALs) should be used to address such activities (e.g., violent acts between individuals in the Owner Controlled Area).
- Joint Information Center - Located at 1255 Research Forest, Macedon, NY, it has facilities for press briefings, public inquiry and general information dissemination. Information regarding the status of Ginna Station will come from the EOF.
- Local State of Emergency - May be declared by a county executive in the event that public safety is imperiled by a disaster or public emergency. Following such a declaration, the county executive may promulgate local emergency orders to protect life and property or to bring the emergency under control. Actions may include prohibition or control of vehicular traffic, closing of public facilities and suspension of local ordinances. (Further details provided in NYS Executive Law Article 2-B.)
- Operations Support Center (OSC) - Located in the Ginna Administration Building's Outage Control Center where personnel qualified to support the Operations needs of the plant will be assigned.
- Protective Action Recommendation (PAR) - Recommendation by the licensee to County and State officials to shelter or evacuate members of the general public based upon plant conditions or projected radiological doses.

Appendix 1

NUREG-0654 Evaluation Criteria Cross Reference

NUREG-0654 Reference	Criteria	Plan Reference Section No.
A1 – Item a	Identification of Response Organizations	2.~~8~~3
A1 – Item b	Organization of Concept of Operations	1.1, 1.2
A1 – Item c	Organizational Inter-Relationships - Block Diagrams	Fig. 2.~~7~~1
A1 – Item d	Designation of Organization Director	1.1, 2.2
A1 – Item e	24 Hour Response/Communication	5.2
A2 – Item a	Organization Authority	N/A (not required in Licensee Plans)
A2 – Item b	Legal Basis for Organization Authority	N/A (not required in Licensee Plans)
A3	Formal Intra-government/Organization Agreements	Appendix 2
A4	Designated Authority for Organization Resource Continuity	2.2
B1	Provision for Onsite Shift Emergency Organization	2.1, 2.2
B2	Designation of Onsite Emergency Director	2.2
B3	Line of Succession for the Emergency Director	EP-AA-1000, Section II.B~~2.3~~
B4	Functional Responsibilities of the Emergency Director	3.5, 2.2, ~~2.4,~~ 4.5.1, 4.8, EP-AA-1000, Section II.B
B5	Assignment of On-Site Emergency Personnel	2.1, 2.2~~ thru 2.6~~, 6.0, EP-AA-1000, Section II.B
B6	Onsite Emergency Organization Interface	2.2~~ thru 2.6~~, 5.1, 7.1, EP-AA-1000, Section II.B
B7	Designation of Minimum Staffing Requirements for Plant Emergencies	EP-AA-1000, Section II.B~~Table 2.1~~
B7 – Item a	Logistics Support for Emergency Personnel	EP-AA-1000, Section II.B~~2.7~~

Appendix 1

NUREG-0654 Evaluation Criteria Cross Reference

B7 – Item b	Technical Support for Planning/Re-entry/Recovery Operations	EP-AA-1000, Section II.B~~2.5~~
B7 – Item c	Management Level Interface with Governmental Authorities	EP-AA-1000, Section II.B~~2.5~~
B7 – Item d	Information/Press Releases	4.11
B8		2.~~94~~, 2.~~105~~
B9	Designation/Responsibility/Limitations of Local Agency Assistance	2.~~83~~, 2.~~105~~, Appendix 2
C1 – Item a	Authority to Request RAP/IRAP Resources	2.2, 4.5, 5.2.5
C1 – Item b	Federal Resources Expected and Time of Arrival	2.~~83~~.4
C1 – Item c	Specify Support Available to Federal Response	2.~~83~~.4
C2 – Item a	Organization Representative at Near-Site Emergency Operations Facility	N/A (not required in Licensee Plans, see State & County Plans)
C2 – Item b	Licensee Representative at Governmental EOC	4.8
C3	Radiological Laboratory Capabilities	2.~~105~~.9
C4	Nuclear Assistance Sources	2.~~83~~, 2.~~94~~, 2.~~105~~
D1	Facility Emergency Classification System	3.0
D2	Initiating Conditions	
D3	State and Local Emergency Classification System	N/A (not required in Licensee Plans, see State & County Plans)
D4	State and Local Procedures	N/A (not required in Licensee Plans, see State & County Plans)
E1	Bases for Notification/Verification	3.0
E2	Personnel Notification/Alert/Mobilization Procedures	4.3
E3	Contents of Initial Plant Emergency Messages	4.7
E4	Provisions for Content of Plant Follow-up Messages	4.8
E5	Dissemination of Information from Plant Operators	N/A (not required in Licensee Plans, see State & County Plans)

Appendix 1

NUREG-0654 Evaluation Criteria Cross Reference

E6	Means for Population Notification	5.3.13
E7	Provision for Written Public Instruction Messages	4.5
F1 – Item a, b, c, d, f	24-Hour Notification/Activation of Emergency Response Network	5.2.5
F1 – Item e	Alerting Ginna Emergency Personnel	4.6
F2	Communications with Medical Support Facilities	2.~~10~~5
F3	Periodic Communications System Testing	5.2
G1	Public Emergency Education/Information	4.11
G2	Public Emergency Education Program	4.11
G3	Public Information Control Point	5.1.5
G4 – Item a	Designated Public Information Spokesperson	4.11
G4 – Item b	Timely Exchange Among Spokespersons	EP-AA-1000, Section II.B~~2.5.c.2~~
G4 – Item c	Arrangements for Rumor Control	EP-AA-1000, Section II.B~~Figure 2.6~~
G5	News Media Education Program	4.11
H1	NUREG-0696 Technical & On-site Operations Support Centers	5.1.2, 5.1.3
H2	Near-Site Emergency Operations Facilities	5.1.4, 5.1.5
H3	State & Local Emergency Operations Center	N/A (not required in Licensee Plans, see State & County Plans)
H4	Provision for Activation/Staffing of Facilities	4.3
H5	Onsite Monitoring Systems	5.3.1 - 5.3.8, 5.3.10, 5.3.14
H6 – Item a	Offsite Geophysical Phenomena Monitors	5.3.8
H6 – Item b	Off-site Radiological Monitors/Dosimetry	5.3.7, 5.3.11
H6 – Item c	Laboratory Facilities	5.3.9
H7	Off-site Radiological Monitoring Equipment	5.3.10, 5.3.11
H8	Provision for Meteorological Instrumentation/Procedures	5.3.10

Appendix 1

NUREG-0654 Evaluation Criteria Cross Reference

K7	Capability for Decontamination of Relocated Onsite Personnel	4.9.5
L1	Ability of Medical/Health Services to Evaluate Radiation Exposure/Handle Contaminated Individuals	2.~~105~~.2, 2.~~105~~.4-2.~~105~~.7, 5.5
L2	Onsite First Aid Capability	4.9.3
L3	Identification of Medical Services Facilities Equipped/Trained to Treat Radiological Accident Victims	N/A (not required in Licensee Plans, see State & County Plans)
L4	Transportation to Medical Facilities	2.~~105~~.2
M1	Plans for Recovery/De-escalation of Protective Measures	7.0, 7.1
M2	Designation of Facility Recovery Organization	7.1
M3	Notification of Recovery Operation Initiation	7.1
M4	Methodology for Periodic Exposure Estimate	5.3.3
N1 – Item a	Drills to Simulate Offsite Releases	6.1.4
N1 – Item b	Drills to Test All Elements, Time, & Weather Conditions	6.1.4
N2 – Item a	Communication Drills	6.1.4, 6.2
N2 – Item b	Fire Drills	6.1.4
N2 – Item c	Medical Emergency Drills	2.~~105~~.2, 2.~~105~~.4, 2.~~105~~.5
N2 – Item d	Radiological Monitoring Drills	6.1.4
N2 – Item e	Health Physics Drill	6.1.4
N3	Drill Scenarios	6.1.4
N4	Official Observers/Critique	6.1.4
N5	Improvements/Corrective Actions	6.1.4
O1 – Item a	Onsite Emergency Response Training for Offsite Emergency Organizations	6.1.3
O1 – Item b	Offsite Emergency Response Organization Training	N/A (not required in Licensee Plans, see State & County Plans)
O2	Onsite Training/Corrective Actions	6.1
O3	Onsite First Aid Team Training	4.9.3
O4	Response Personnel Training	6.1

Appendix 1

NUREG-0654 Evaluation Criteria Cross Reference

O5	Annual Retraining of Personnel	6.1
P1	Planning Personnel Training	6.1.5
P2	Designation of Planning Authority	1.1
P3	Designation of Emergency Planning Coordinator	1.1
P4	Annual Review and Update of Response Plan	6.2
P5	Provisions for Plan Distribution and Promulgation of Plan Revisions	6.2
P6	Listing of Supporting Plans	Appendix ~~54~~
P7	Procedures for Plan Implementation	Appendix 3
P8	Table of Contents	Page 1
P9	Independent Audit of Emergency Preparedness Program	6.4
P10	Updating of Telephone Numbers	6.2

Appendix 3

Emergency Plan Implementing Procedures

EPIP #	Emergency Plan Implementing Procedures (EPIP)	E Plan Reference
A-7	Procedures for Handling Injuries/Medical Emergencies at Ginna Station	2.~~116~~, 5.5
EP-CE-113	Personnel Protective Actions	4.4, 4.5.1, 5.2.1, 5.3, 5.4 4.9.1, 4.9.3
EP-AA-112-500-F-54	GNP Offsite Monitoring Team Guidance	5.3.3, 5.3.11
EP-CE-111	Emergency Classification and Protective Action Recommendations	4.5.1
EP-CE-114-100	Emergency Notifications	1.3, 3.0, 3.2, 3.3, 4.2-4.5, 5.2.4, 5.2.5,
EP-AA-112-600	Public Information Organization	2.1, 2,2 ~~thru 2.7~~, 4.11, 5.1, 5.1.5, EP-AA-1000, Section II.B
EP-AA-112-400	Emergency Operations Facility Activation and Operations	2.1, 2.2 ~~thru 2.7~~, 5.1, 5.1.4, 5.2.5, EP-AA-1000, Section II.B
EP-AA-112-100	Control Room Operations	2.1, 2.2 ~~thru 2.7~~, 5.1, 5.1.1, 5.2.5, EP-AA-1000, Section II.B
EP-AA-112-200	TSC Activation and Operations	2.1, 2.2 ~~thru 2.7~~, 5.1, 5.1.2, EP-AA-1000, Section II.B
EP-AA-112-300	Operations Support Center Activation and Operations	2.1, 2.2 ~~thru 2.7~~, 5.1, 5.1.3, EP-AA-1000, Section II.B

Appendix 4

Emergency Response Organization Responsibilities

Note: The positions and responsibilities described in this Appendix apply to Ginna station and supersede the list of ERO positions and respective ERO responsibilities identified in the Exelon Standard Plan.

1.0 On-Shift Staff Positional Responsibilities

The emergency plan responsibilities for shift personnel are:

1.1 Shift Emergency Director / Shift Manager:

NOTE: * Indicates Non-Delegable responsibilities when performing Emergency Director duties.

- Coordinate between CR, OSC and TSC to set OSC team task priorities.
- Perform or direct emergency PA announcements.
- Ensure flow of information within and between the emergency response facilities.
- Integrate ERO activities with the Incident Command Post (ICP) response activities.
- Assume overall command and control of emergency response.
- Event classification.*
- Direct notification and activation of the ERO.
- Notification of off-site authorities (approval of state/local and NRC notifications)*.
- Direct ENS communications with the NRC.
- Oversee the performance and evaluate the results of dose projection activities.
- Ensure appropriate accountability and search and rescue actions for plant personnel.
- Ensure appropriate evacuation actions for plant personnel*.
- Protective Action Recommendations (PARs) for the general public*.
- 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.*
- Authorize and direct extreme measures (SAMGs, EMDGs, 50.54(x), or suspend security controls).
- Terminate the emergency event.

1.2 Shift Manager (After Transfer of Command and Control)

- Coordinate between CR, OSC and TSC to set OSC team task priorities.

Appendix 4

Emergency Response Organization Responsibilities

- Perform or direct emergency PA announcements.
- Ensure flow of information within and between the emergency response facilities.
- Participate in Inter-Facility Briefings to communicate and obtain event and response information.
- Authorize and prioritize requests for external assistance (police, fire, medical) as necessary.
- Assist with Emergency Classification.

1.3 Shift Technical Advisor (STA), SROs and ROs

- Assist with emergency classification.

1.4 Designated Shift Communicator

- Notify the ERO.
- Perform offsite emergency notifications to state and local authorities.
- Provide plant data and plant information to the NRC via the ENS.

1.5 Designated Shift Dose Assessor

- Perform dose assessments.

1.6 Shift Radiation Protection Technician(s)

- Provide radiation protection for shift personnel
- Conduct surveys and radiological monitoring to assist with emergency assessment activities.

1.7 Shift Chemistry Technician

- Perform dose assessment
- Conduct sampling to assist with emergency assessment activities.

1.8 Security Shift Supervisor

- Supervise security force activities.
- Notify the ERO.
- Perform offsite emergency notifications to state and local authorities.
- Establish and maintain Protected Area accountability.
- Direct security actions for offsite assembly.
- Establish and supervise plant access controls.
- Supervise security actions for site evacuation.
- Coordinate administration of KI to the security officers.

Appendix 4

Emergency Response Organization Responsibilities

1.9 Other Shift Personnel (Non-licensed Operators, Security Force, Maintenance Personnel)

- Support emergency response as directed.

2.0 Technical Support Center (TSC):

2.1 Station Emergency Director

- Manage all onsite emergency activities in support of plant operations.
- Establish plant/station response priorities.
- Integrate ERO activities with the Incident Command Post (ICP) response activities.
- Authorize and prioritize requests for external assistance (onsite technical support, manpower) as necessary.
- Classify emergencies.
- 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.
- Provide informational updates and recommendations to the Shift ED, regarding plant status and activities.
- Authorize emergency response facility relocations.
- Evaluate event assessments and mitigative strategies to determine Operations and response actions.
- Authorize and direct extreme measures (SAMGs, EDMGs, §50.54(x) or suspend security controls).
- Ensure appropriate accountability and search and rescue actions for plant personnel.
- Ensure accountability, once established, is maintained in all occupied areas of the station.
- Ensure appropriate evacuation actions for plant personnel.
- Coordinate between CR, OSC and TSC to set OSC team task priorities.
- Conduct facility briefs.
- Participate in the Inter-Facility briefing to communicate and obtain event and response information.
- Terminate the emergency event.
- Assist in the development of recovery plans.

2.2 TSC Director

- Activate the Facility.

Appendix 4

Emergency Response Organization Responsibilities

- Establish and maintain facility accountability.
- Manage the operation of the facility.
- Review and ensure facility displays are maintained current.
- Coordinate ERO shift relief rosters for the onsite facilities.
- Develop ERO shift relief rosters for the facility.
- Coordinate integration of the NRC Site Team
- Arrange for logistics support.
- Ensure flow of information within and between the emergency response facilities.
- Provide input for facility briefs.
- Coordinate TSC relocation.

2.3 Technical Manager

- Manage the activities of the TSC engineering / technical staff.
- Ensure additional personnel and/or equipment is arranged for, as necessary.
- Provide engineering support for accident detection and assessment.
- Develop mitigative strategies based on assessment of the event.
- Analyze and develop extreme measures actions (SAMGs, EDMGs, §50.54(x) or suspend security controls).
- Provide input for facility briefs.

2.4 Electrical Engineer

- Provide engineering support for accident detection and assessment.
- Provide input into mitigative strategies.
- Analyze and develop extreme measures actions (SAMGs, EDMGs, §50.54(x) or suspend security controls).

2.5 Mechanical Engineer

- Provide engineering support for accident detection and assessment.
- Provide input into mitigative strategies.
- Analyze and develop extreme measures actions (SAMGs, EDMGs, §50.54(x) or suspend security controls).

2.6 Core / Thermal Hydraulic Engineer

- Provide engineering support for accident detection and assessment.
- Provide input into mitigative strategies.
- Perform core damage estimations.
- Analyze and develop extreme measures actions (SAMGs, EDMGs, §50.54(x) or suspend security controls).

2.7 TSC/OSC Computer Specialist

- Support the setup of systems and equipment within the facility.

Appendix 4

Emergency Response Organization Responsibilities

- Monitor facility equipment (computer related and communications) to ensure adequate operation.
- Resolve any IT related malfunctions.

2.8 Operations Manager

- Manage the activities of the TSC Operations staff.
- Assist with emergency classification.
- Provide technical assistance communication path to the Shift Manager.
- Support the establishment of plant/station response priorities.
- Provide operations support for accident detection and assessment.
- Recommend operations actions to the Shift Emergency Director in support of restoration and accident mitigation.
- Analyze and develop extreme measures actions (SAMGs, EDMGs, §50.54(x) or suspend security controls).
- Coordinate between CR, OSC and TSC to set OSC team task priorities.
- Coordinate operations activities outside of the Control Room between the Shift Emergency Director and OSC.
- Provide input for facility briefs.

2.9 ENS Communicator

- Provide event data and plant information to the NRC via the ENS.
- Maintain continuous communications with the NRC, if requested, via the NRC ENS phone or commercial telephone line.

2.10 Ops Communicator (TSC)

- Communicate key information between the facilities over the Operations Status Line.
- Monitor assigned communication line and provide key information to facility staff.

2.11 Ops Communicator (CR)

- Communicate key information between the facilities over the Operations Status Line.
- Monitor assigned communication line and provide key information to facility staff.

2.12 Maintenance Manager

- Direct the total onsite maintenance and equipment restoration effort.
- Coordinate repair and OSC team task information between the TSC and OSC.
- Determine adequacy of OSC staffing.
- Provide input for facility briefs.

2.13 TSC Radiation Protection Manager

Appendix 4

Emergency Response Organization Responsibilities

- Manage and direct the radiological activities of the RP personnel.
- Ensure additional personnel and/or equipment is arranged for, as necessary.
- Provide radiological support for accident detection and assessment.
- Monitor, evaluate and communicate conditions involving any release of radioactivity.
- Provide support and logistics for site evacuation activities.
- Evaluate the need for and ensure proper use of KI.
- Ensure habitability is established and maintained for occupied onsite areas.
- Ensure proper emergency exposure controls are taken for personnel.
- Provide radiological assistance for planning rescue operations and repair team monitoring.
- Direct personnel decontamination activities.
- Provide radiological assistance for the transfer of injured and/or contaminated personnel.
- Provide input for facility briefs.
- Perform Dose Assessment

2.14 Security Coordinator

- Integrate ERO activities with the ICP response activities.
- Manage the activities of the site security force.
- Request and coordinate emergency activities with Local Law Enforcement Agencies (LLEAs).
- Provide security related communications with the NRC.
- Direct accountability and search & rescue activities.
- Direct site evacuation activities.
- Direct site access controls activities.
- Coordinate security activities between the SSS and OSC.
- Determine radiation protection measures for security force personnel and law enforcement agency personnel on site.
- Provide input for facility briefs.

2.15 TSC Administrative Staff

- Perform administrative and logistic support functions for facility personnel.
- Establish and maintain facility accountability.

3.0 Operations Support Center (OSC):

3.1 OSC Director

- Activate the Facility.
- Manage the operation of the facility.

Appendix 4

Emergency Response Organization Responsibilities

- Develop ERO shift relief rosters for the facility.
- Ensure flow of information within and between the emergency response facilities.
- Support the establishment of plant / station response priorities.
- Direct accountability and search & rescue activities.
- Establish and maintain facility accountability.
- Coordinate between CR, OSC and TSC to set OSC team task priorities.
- Coordinate OSC team dispatch and control.
- Conduct facility briefs.
- Participate in the Inter Facility Briefing to communicate and obtain event and response information.

3.2 Assistant OSC Director

- Coordinate between CR, OSC and TSC to set OSC team task priorities.
- Participate with OSC team dispatch and control.
- Assemble and dispatch OSC and offsite monitoring teams.
- Provide input for facility briefs.

3.3 OSC Craft, Chemistry and Operations Group Leads

- Manage OSC manpower needs.
- Assist with formation of OSC teams.
- Participate with OSC team dispatch and control.
- Provide technical support to dispatched OSC teams.

3.4 OSC Craft, Chemistry and Operations Personnel

- Perform job duties as an OSC team member.

3.5 OSC Radiation Protection (RP) Group Lead

- Manage OSC manpower needs.
- Monitor in-plant radiological conditions.
- Ensure habitability is established and maintained for occupied onsite areas.
- Participate with OSC team dispatch and control.
- Coordinate RP support for OSC teams.
- Track OSC Team emergency exposure.
- Implement appropriate protective measures for OSC personnel.
- Establish OSC and plant access radiological controls.

Appendix 4

Emergency Response Organization Responsibilities

- Provide input for facility briefs.

3.6 OSC Radiation Protection Technicians(s)

- Perform habitability monitoring in occupied areas.
- Perform job duties as an OSC team member.

3.7 OSC Team Tracker

- Maintain Team Tracking Status display.
- Participate with OSC team dispatch, control and tracking.
- Track and maintain communications with OSC teams.

3.8 Operations Communicator - OSC

- Communicate key information between the facilities over the Operations Status Line.
- Monitor the Operations Status Line and announce key information to facility staff.
- Display, monitor and trend plant data and event information on the facility display systems.

3.9 Onsite Monitoring Staff

- Perform and report results of radiation surveys

3.10 OSC Administrative Staff

- Perform administrative and logistic support functions for facility

4.0 Offsite ERO: Emergency Operations Facility

4.1 Corporate Emergency Director

- Assume overall command and control of emergency response.
- Ensure all Exelon emergency response facilities are properly staffed and activated.
- Notification of offsite authorities (approval of state/local and NRC notifications).
- Protective Action Recommendations (PARs) for the general public.
- Ensure the established priorities for placing the Station in a safe condition are completed.
- Integrate ERO activities with the ICP response activities.
- Authorize and prioritize requests for external assistance (governmental) as necessary.
- Authorize and prioritize requests for external assistance (offsite technical support, manpower) as necessary.

Appendix 4

Emergency Response Organization Responsibilities

- Ensure other organization's management/decision makers (NRC, State, Exelon, etc.) are kept informed of the emergency situation.
- Approve technical content of media statements.
- Authorize and direct extreme measures (SAMGs, EDMGs, §50.54(x) or suspend security controls).
- Establish a recovery plan and organization.
- Conduct facility briefs.
- Conduct an Inter-Facility briefing to communicate and obtain event and response information.

4.2 EOF Director

- Activate the Facility.
- Manage the operation of the facility.
- Coordinate for continual shift staffing requirements as needed.
- Coordinate integration of the NRC site team.
- Prepare State/Local notification forms and obtain Corporate ED approval to support the completion of timely offsite event notifications.
- Participate in the Inter-Facility briefing to communicate and obtain event and response information.
- Provide input for facility briefs.

4.3 EOF Technical Advisor

- Track and trend critical parameters.
- Monitor plant status and Control Room activities.
- Provide input for facility briefs.

4.4 Ops Communicator - EOF

- Communicate key information between the facilities over the Operations Status Line.
- Monitor assigned communication line and provide key information to facility staff.

4.5 EOF Logistics Manager

- Ensure ERO personnel have been properly notified and are responding to the facility.
- Oversee staffing of EOF and assist with staffing for other facilities.
- Develop ERO shift relief rosters for the facility.

Appendix 4

Emergency Response Organization Responsibilities

- Coordinate ERO shift relief rosters for all facilities and the notification of personnel.
- Manage the administrative support staff.
- Review and ensure facility displays are maintained current.
- Manage the procurement and logistical support activities for the onsite and offsite emergency response personnel and facilities.
- Coordinate with the Nuclear Duty Officer to maintain communications with ANI, DOE, and INPO.
- Monitor and maintain access controls for the facility.
- Communicate with and coordinate support for ERO responders or plant personnel sent offsite to relocation areas.
- Provide input for facility briefs

4.6 EOF/JIC Computer Specialist

- Support the setup of systems and equipment within the facility.
- Monitor facility equipment (computer related and communications) to ensure adequate operation.
- Resolve any IT related malfunctions.
- Assist in operation of JIC audio visual equipment.

4.7 EOF Administrative Staff

- Assist with completing ERO shift relief.
- Assist with setting up EOF equipment in preparation for facility activation.
- Perform administrative and logistic support functions for facility personnel.

4.8 EOC Communicator

- Monitor plant conditions and event response activities.
- Provide information updates to and address questions and support requests from the offsite liaisons.
- Communicate actions being considered or taken by counties and state to the EOF.
- Provide input for facility briefs.

4.9 State Liaison

- Communicate EOC / ICP actions and decisions to the EOF.
- Provide technical support and information to the EOC / ICP.

4.10 County Liaison(s)

- Communicate EOC / ICP actions and decisions to the EOF.

Appendix 4

Emergency Response Organization Responsibilities

- Provide technical support and information to the EOC / ICP.

4.11 EOF Radiation Protection Manager

- Manage and direct the radiological activities of the EOF radiological staff.
- Coordinate activities with the external agency field monitoring teams.
- Coordinate the comparison and exchange of dose assessment results with offsite agency personnel.
- Provide radiological data that impacts emergency action level (EAL) classifications.
- Monitor, evaluate and communicate conditions involving any release of radioactivity.
- Oversee the performance and evaluate the results of dose projection activities.
- Perform dose assessment.
- Oversee the performance and evaluate the results of OMT activities.
- Provide support and logistics for site evacuation activities.
- Evaluate the need for and ensure proper use of KI.
- Evaluate conditions and determine recommendations for PARs.
- Ensure proper emergency exposure controls are taken for personnel.
- Provide assistance to state and federal agencies for ingestion pathway radiological activities.
- Provide input for facility briefs.

4.12 HPN Communicator

- Provide event data and plant information to the NRC via the HPN.
- Monitor assigned communication line and provide key information to facility staff.

Appendix 4

Emergency Response Organization Responsibilities

4.13 Dose Assessor

- Monitor, evaluate and communicate conditions involving any release of radioactivity.
- Perform dose assessment.
- Evaluate conditions and determine recommendations for PARs.

4.14 Environmental Coordinator

- Direct and track Offsite Monitoring Team activities.
- Coordinate activities with the external agency field monitoring teams.
- Establish and maintain OMT communications.
- Maintain and update the radiological status displays.
- Coordinate the receipt, analysis, storage and transfer of field monitoring samples.
- Record and report field monitoring survey, sample and exposure information.

4.15 Offsite Monitoring Teams

- Establish and maintain OMT communications.
- Perform equipment checks and inventories in preparation of deployment.
- Track radiological plumes.
- Perform and report results of radiation surveys and environmental sampling.
- Coordinate the receipt, analysis, storage and transfer of field monitoring samples.
- Communicate exposure status to the Environmental Coordinator.

4.16 State/Local Communicator

- Perform offsite emergency notifications to state and local authorities.

5.0 Public Information ERO (JIC Staff)

5.1 JIC Manager

- Activate the Facility.
- Manage the operation of the facility.
- Assist offsite agency personnel responding to the facility.
- Coordinate integration of the NRC Site Team.
- Provide liaison to the NRC Site Team.
- Arrange for support for Emergency Alert System (EAS) information.

Appendix 4

Emergency Response Organization Responsibilities

- Ensure flow of information within and between the emergency response facilities.
- Interface with offsite agency Public Information Officers (PIOs) to coordinate overall information flow to the media and public.
- Coordinate facilitation of the media briefing schedule.
- Ensure news media briefings are held regularly during the course of the emergency.
- Oversee conduct of media briefings.
- Integrate ERO activities with the Incident Command Post (ICP) response activities
- Assist in the development of recovery plans.
- Conduct facility briefs.
- Participate in the Inter-Facility Briefing to communicate and obtain event and response information.

5.2 Company Spokesperson

- Establish periodic contact with the communications personnel in the corporate office.
- Interface with offsite agency PIOs to coordinate overall information flow to the media and public.
- Provide interviews to the media.
- Serve as Company Spokesperson during press conferences at the JIC.
- Participate in the Inter-Facility Briefing to communicate and obtain event and response information.
- Provide input for facility briefs.

5.3 JIC Logistics Manager

- Manage the administrative support staff.
- Develop ERO shift relief rosters for the facility.
- Arrange for logistics support.
- Oversee set-up and testing of JIC equipment.
- Maintain access control to the JIC.
- Provide input for facility briefs.
- Oversee collection of technical data and station activities for drafting Media Statements and answering JIC questions.
- Coordinate preparation, review and distribution of Media Statements.

Appendix 4

Emergency Response Organization Responsibilities

- Obtain ED approval for the technical content of Media Statements.
- Keep JIC staff informed of plant status and Exelon emergency response activities.

5.4 News Writer

- Prepare draft Media Statements.
- Develop public information materials (bulletins, backgrounders and chronologies).

5.5 JIC Technical Advisor

- Provide technical expertise to the JIC staff.
- Assist the News Writer with development of technically accurate media statements.
- Provide answers to technical questions from the news media regarding the emergency situation.
- Periodically monitor EOF/TSC briefings and Operations Status Line to obtain information.
- Provide technical information support to the Company Spokesperson.
- Monitor event information on the facility display systems.
- Provide input for facility briefs.

5.6 Media Liaison

- Ensures media is informed of protocol and schedules established for media briefings.
- Coordinate preparations for media briefings.
- Distribute media statements to the media in the media briefing area.
- Coordinate media relations in JIC and update media between press conferences.
- Coordinate special interviews and facility tours for the media.
- Coordinate JIC briefing area preparation and establish briefing protocol.

5.7 JIC Administrative Staff

- Assist in badging and direction of members of the media to proper work locations.
- Perform administrative and logistic support functions for facility personnel.
- Distribute media materials to the press.

Appendix 4

Emergency Response Organization Responsibilities

5.8 Media Monitoring / Rumor Control Coordinator

- Supervise media monitoring and Inquiry Phone Team personnel.
- Review Media Monitoring team information for trends, misinformation and rumors.
- Review Phone Team information for trends, misinformation and rumors.
- Ensure adequate staff is available to perform media monitoring and phone team functions.
- Provide input for facility briefs.

5.9 Inquiry Phone Team

- Respond to and log phone inquiries from the media and the public.
- Monitor telephone lines for trends, misinformation and rumors.

5.10 Media Monitoring Team

- Monitor media coverage of the event for trends

5.11 JIC Security

- Provide badging and access controls for the facility.

6.0 In addition to the position specific responsibilities listed above all ERO members have the following general responsibilities:

- Perform position turnover for protracted events
- Respond as directed when notified of a declared event
- Maintain personal event logs and records in support of the after action report
- Restore area and materials upon event termination
- Apply fundamental ERO knowledge in the performance of your ERO duties
- Properly use ERO procedures and checklists in the performance of your ERO duties
- Acquire & maintain qualification in your assigned ERO position
- Apply human performance error reduction techniques in the performance of your ERO duties.

License Amendment Request

ENCLOSURE 1 - ATTACHMENT 1B

Emergency Plan Clean Copy Pages – R.E. Ginna Nuclear Power Plant

Standardized Emergency Plan EP-AA-1000
and
Emergency Plan Annex EP-AA-1012

Affected Pages

Standardized Emergency Plan EP-AA-1000

Clean Copy

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

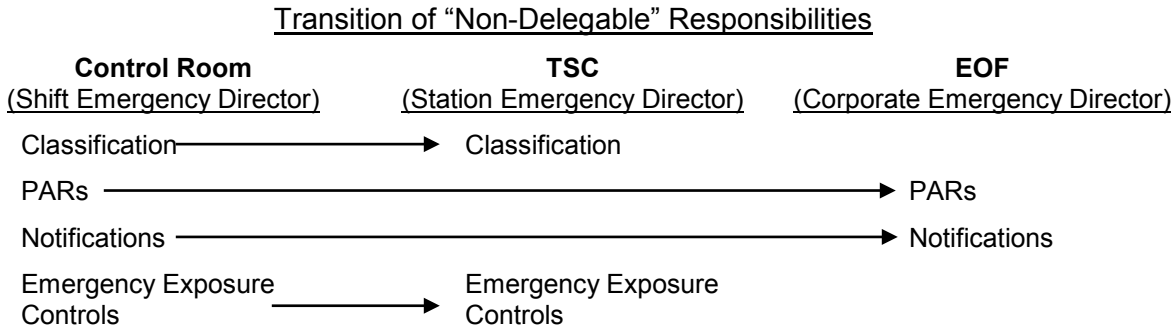
Non-delegable responsibilities include the following functions:

- 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 Communicators TSC

Responsibilities assigned to the ENS Communicators 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 Emergency Director in the evaluation of the significance of an emergency with respect to the public.

- Notify the 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

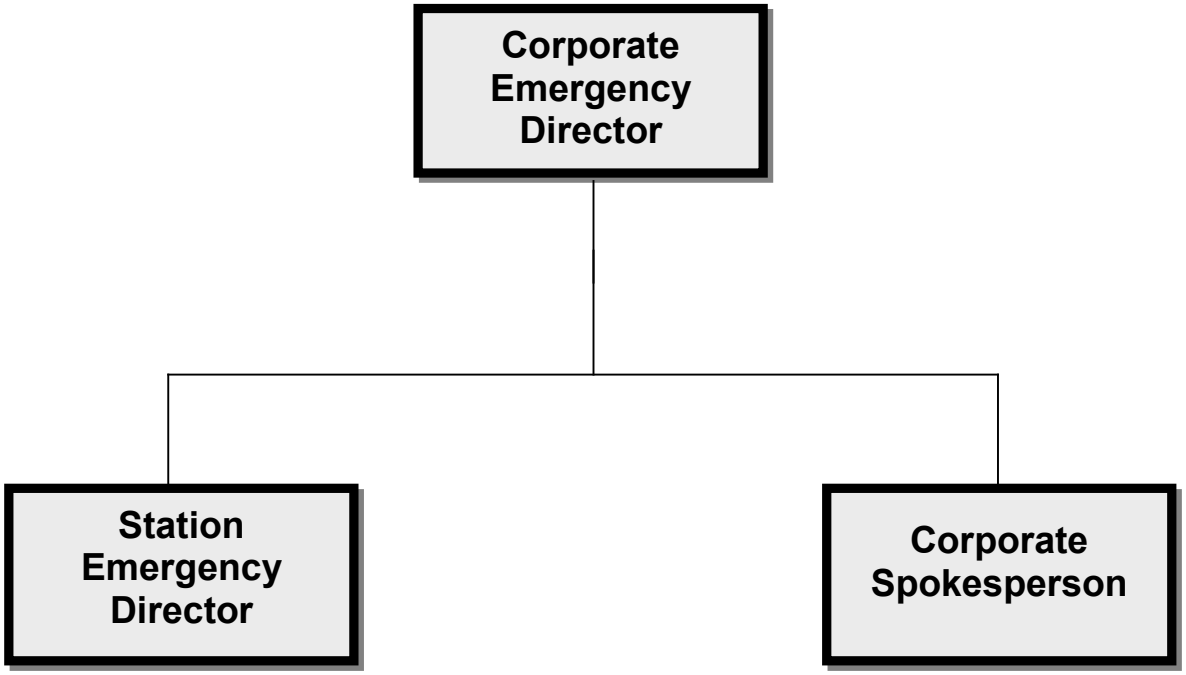
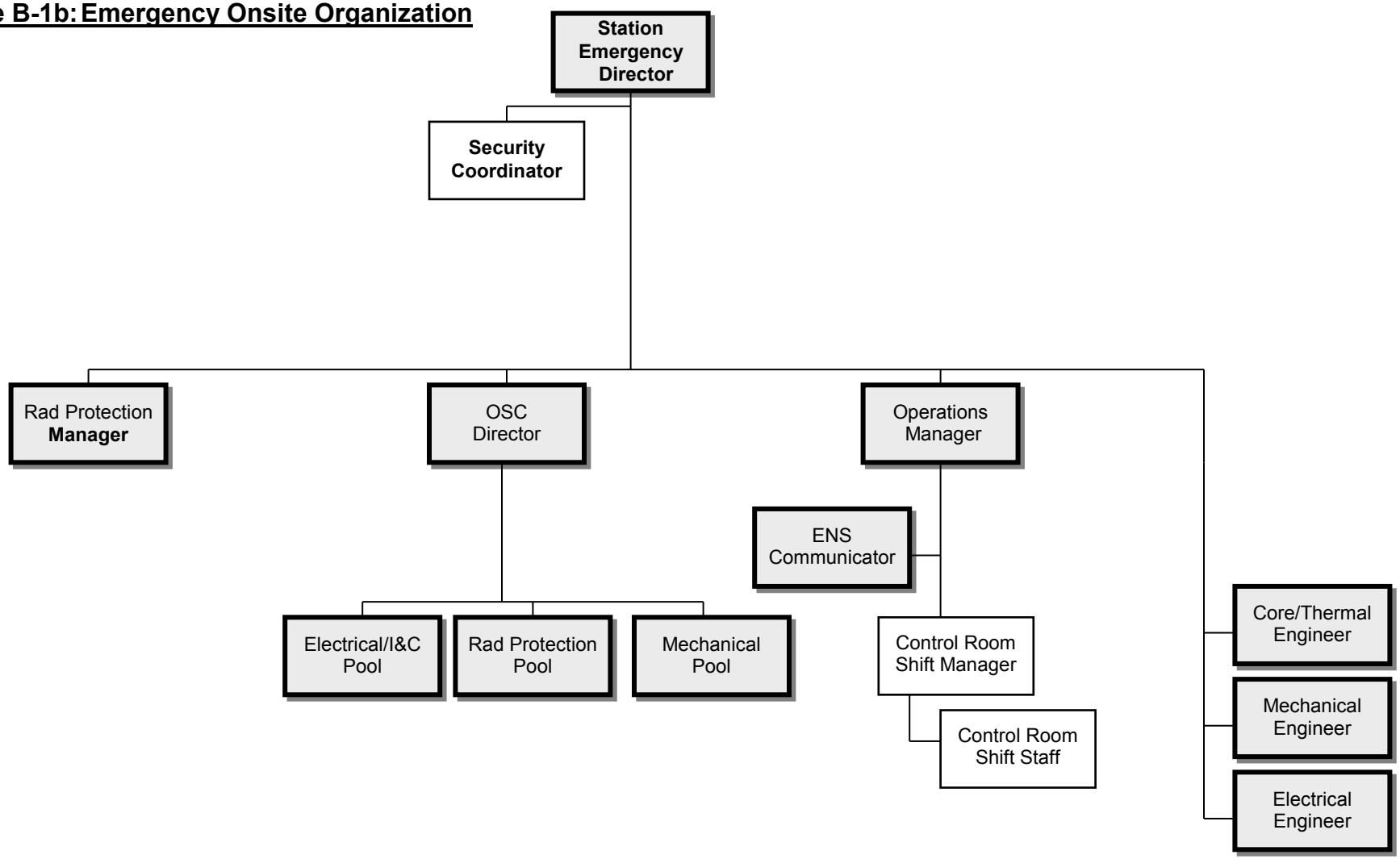


Figure B-1b: Emergency Onsite Organization



.

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

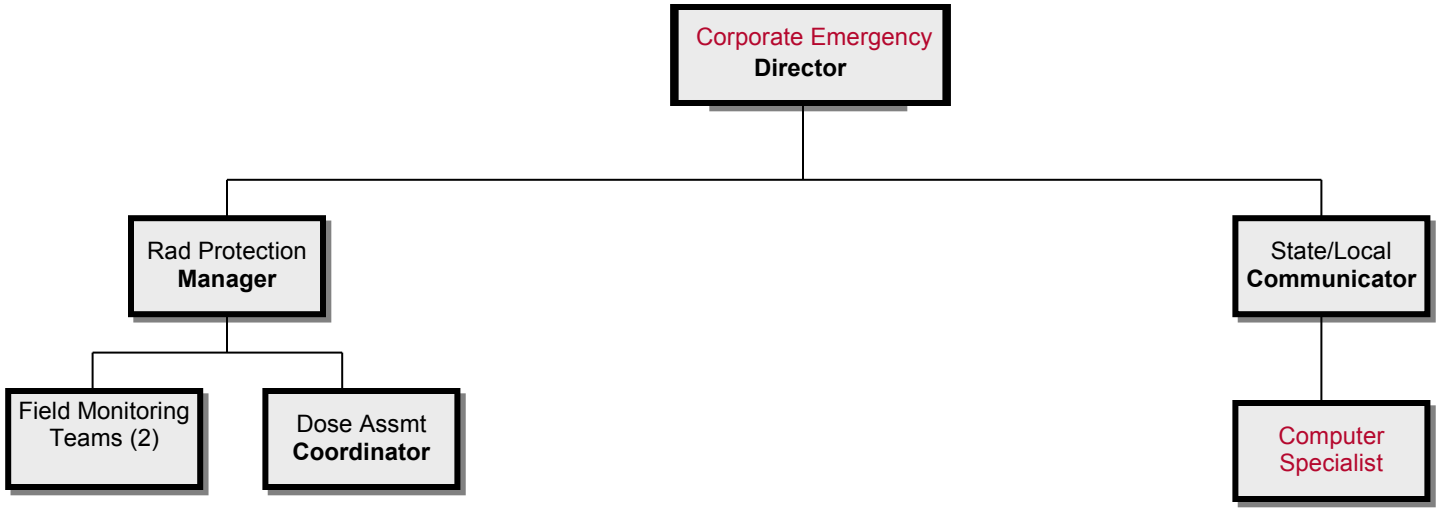
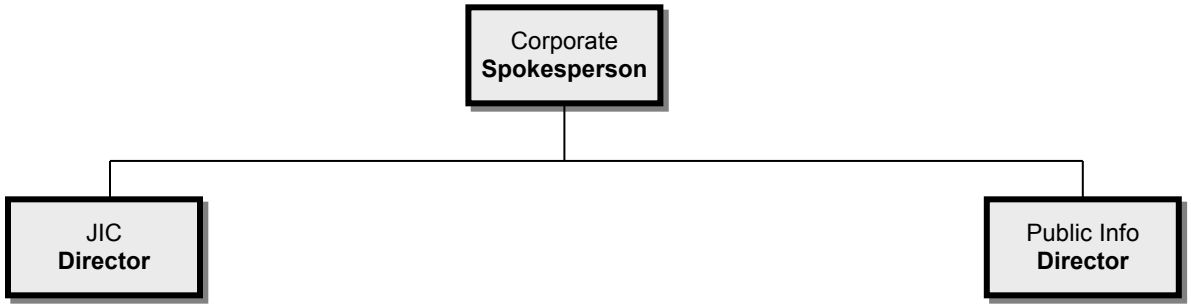


Figure B-1d: Emergency Public Information Organization



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)

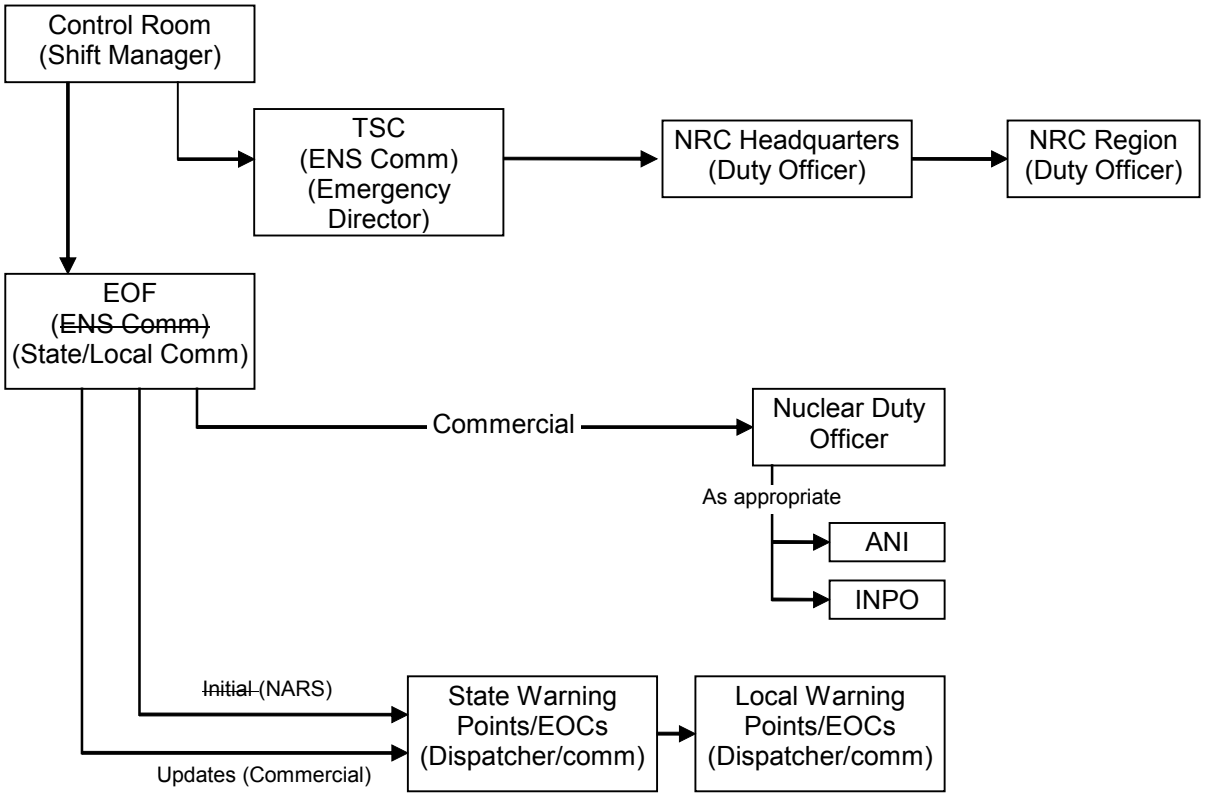
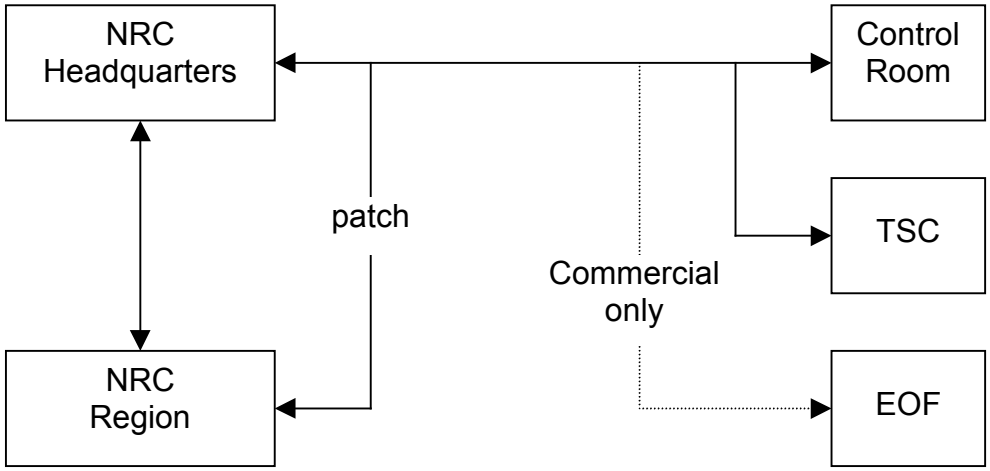


Figure F-3: NRC Communications for Nuclear Response



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.
Command and Control • 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
Communications[3] • 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
Radiation Protection • 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[5]	(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.
Supervision of Radiation Protection Staff and Site Radiation Protection • 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)
Dose Assessments/ Projections • Perform dose assessments/projections and provide input to applicable PAR decision- maker, until relieved.	(1) Shift Dose Assessor [1, 5]	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 • Evaluate plant conditions and recommend emergency classifications, until relieved.	Emergency Classification Advisor[1]	(1) Operations Manager (TSC)	Not applicable	Not applicable
Engineering • Provide engineering coverage related to the specific discipline of the assigned engineer, until relieved.	(1) **Core/ Thermal Hydraulics Engineer - STA**[1] • Evaluate reactor conditions.	**TSC Engineering Staff** • (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)** • 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)** • (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)** • (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	(1) **OSC Director** • Supervise OSC activities as directed by Emergency Coordinator.	**OSC Supervisors** • (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	**Onsite FM Individual** • (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. . **Offsite FMT A** • (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.	**Offsite FMT B** • (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 • Manage and coordinate media information related to the event.	Not applicable	Not applicable	Not applicable	• Corporate Spokesperson • JIC Director • Public Information Director

Emergency Preparedness (EP) Functions	On-Shift	TSC / OSC		EOF/JIC - Alert or Greater[2] Augment w/in 90
		Alert or Greater Augment w/in 60 min.	Alert or Greater Augment w/in 90 min.	
JIC/EOF Information Technology (IT)	Not applicable	Not applicable	Not applicable	• (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.
5. FitzPatrick only: FitzPatrick will staff one (1) RP Technician on-shift and one additional dedicated person to support on-shift Dose Assessment activities. Note 1 does not apply to FitzPatrick for the on-shift dose assessment function. Additional RP Technician support can be obtained from NMP if needed during an emergency.
6. Ginna Only: Two of the RP Personnel who respond at 90 minutes may be survey task qualified and not require ANSI qualifications.

Emergency Plan Annex EP-AA-1012

Clean Copy

EP-AA-1012
Revision x

EXELON NUCLEAR

RADIOLOGICAL EMERGENCY PLAN ANNEX FOR GINNA STATION

TABLE OF CONTENTS

APPENDICES

ADDENDUMS

Section 2: Organizational Control of Emergencies

This section in conjunction with EP-AA-1000, Exelon Nuclear Standardized Radiological Emergency Plan, describes the Exelon Emergency Response Organization (ERO), its key positions and associated responsibilities. It outlines the staffing requirements which provide initial emergency response actions and provisions for timely augmentation of on-shift personnel when required. It also describes interfaces among emergency response personnel and specifies the offsite support available to respond to the nuclear generating stations. Figure 2.1 shows the Inter-relationships of Ginna Station Emergency Response Organizations.

2.1 On-Shift Emergency Response Organization Assignments

The initial phases of an emergency situation at a nuclear station will most likely involve a relatively small number of individuals. These individuals must be capable of (1) determining that an emergency exists; (2) providing initial classification and assessment; and (3) promptly notifying other groups and individuals in the emergency organization. The subsequent phases of the emergency situation may require an increasing augmentation of the emergency organization.

All Exelon Nuclear stations have the capability at all times to perform detection, mitigation, classification, and notification functions required in the early phases of an emergency.

2.2 Authority Over the Emergency Response Organization

The Emergency Director in Command and Control is the designated Exelon individual who has overall authority and responsibility, management ability, and technical knowledge for coordinating all emergency response activities at the nuclear power station. The Emergency Director will immediately and unilaterally initiate any emergency actions, including providing protective action recommendations to authorities responsible for implementing offsite emergency measures.

The Shift Manager is available at all times to assume the responsibilities of Emergency Director. Qualified individuals are on-call to respond to the TSC and EOF to assume Command and Control responsibilities.

2.3 Augmentation of the Emergency Organization and Interface with Other Plans:

The Ginna emergency organization is augmented by a number of offsite services. Figure 2.1 shows the relationship of non-Company offsite organizations in emergency response. Letters of agreement are referenced in Appendix 2. These agreements are considered valid until changed by the author during the annual review of the Emergency Plan. The authors of the letters of agreement are contacted in person or by telephone and the content of the letters is verified.

Plant procedures contain the phone numbers and alternate means of contact needed to initiate emergency response actions. The communicator will initiate a call to New York State, Monroe County and Wayne County EOC, using the NYS Radiological Emergency Communication System (RECS). During working hours,

2.3.2 Local Disaster Coordinator (Wayne County Emergency Management Office and Monroe County Office of Emergency Management):

In general, the responsibilities of the Local Emergency Preparedness Coordinator in each county include the following:

a) On receipt of notification from the State of New York, or Ginna Station Control Room, alert local authorities and officials in accordance with established plans.

b) Coordinate response of local authorities and provide for available local assistance to the Company and State authorities in accordance with established plans.

The participation of the counties, upon notification of an event involving the general public, is outlined in their Radiological Emergency Plans, which are reviewed in Appendix 4.

The Office of Emergency Management in each county consists of small administrative staffs and a pool of reserve personnel located throughout the county. Members receive training in monitoring, establishing relocation centers and providing medical attention, food, and lodging for evacuees. Extensive communication resources are available for use by the Local Disaster Coordinators and staff, including a number of radios for contacting the county fire coordinator, the police forces, public works and commercial radio stations. A roster of telephone numbers and contacts is maintained to communicate with agencies on State and local levels. Monitoring teams are available and radiological kits are maintained in shelters and firehouses located throughout the counties.

2.3.3 United States Coast Guard (USCG):

The USCG provides emergency support upon request by Wayne and Monroe Counties, in accordance with the Wayne County Radiological Emergency Preparedness Plan and Monroe County Radiological Emergency Preparedness Plan.

2.3.4 United States Nuclear Regulatory Commission, Region 1, Incident Response (Reference: NUREG-0728, NRC Incident Response Plan):

This NRC Plan describes the notification, communication decision-making and mobilization of the NRC Incident Response Organization in the event of an event/incident related to Ginna Station.

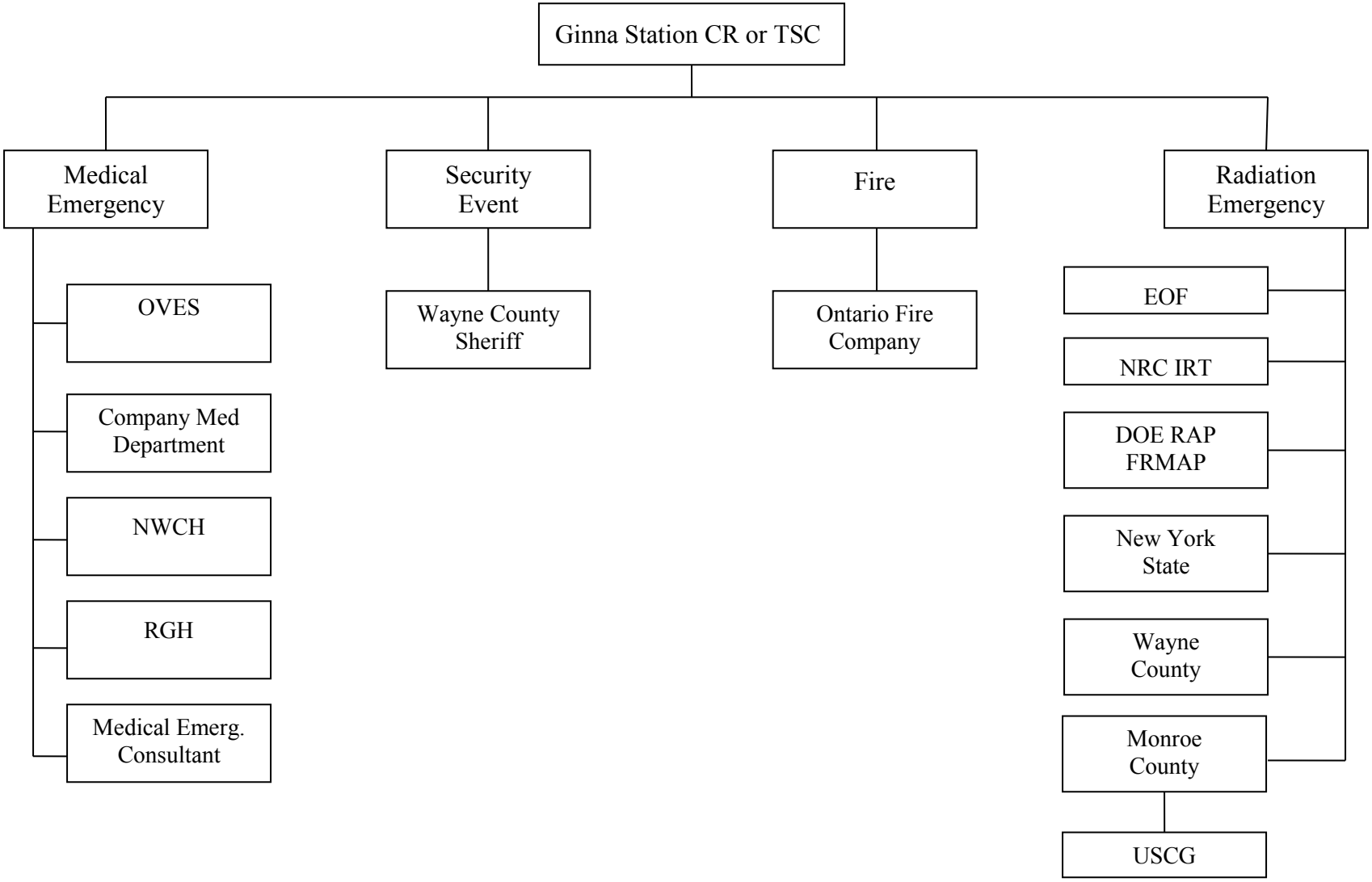
The extent of mobilization will depend upon the emergency classification and associated plant conditions.

The Company will supply whatever support services and resources are needed to maintain Federal assistance.

2.3.5 United States Department of Energy Radiological Assistance Program, Region I, Brookhaven Area Office, Upton, New York (DOE RAP/IRAP):

Since Ginna Station is located in DOE Region I, the Brookhaven Office of the U.S. Department of Energy (DOE) has the responsibility to provide radiological assistance in the event of an emergency. Their principal goal is to be prepared

Figure 2.1 Inter-Relationships of Ginna Station Emergency Response Organizations



NOTE: The following are the four NRC Emergency Classifications.

3.2 Unusual Event:

Events within this Emergency Classification generally characterize off-normal plant conditions which, by themselves, do not constitute significant emergency conditions. Some of these events could, however, indicate a potential degradation in the level of plant safety and/or could escalate to a more severe condition if appropriate action is not taken.

The primary purpose for this classification is to ensure that the plant operating staff recognizes initiating conditions, takes appropriate action, and comes to a state of readiness to respond in the event that the condition becomes more significant. The Unusual Event classification or higher also requires that offsite authorities be promptly informed of the abnormal condition by use of the Radiological Emergency Communications System (RECS) and the New York State Radiological Emergency Data Form, Part I, found in procedure EP-CE-114-100. No response by offsite authorities is necessary for non-hostile action events within this classification.

When giving notice to State and county officials, the Company will make sure that they clearly understand the Unusual Event classification and that, if conditions change, there will be further notification.

3.3 Alert:

This Emergency Classification is characterized by events which indicate an actual or potential substantial degradation of the level of plant safety or a security threat that involves probable life-threatening risk to site personnel or damage to site equipment because of hostile action. This classification requires response by the plant ERO and augmentation of onsite emergency resources. It constitutes the lowest level where emergency offsite response for non-hostile action events may be anticipated.

All Ginna emergency facilities will be staffed at an Alert or higher.

Prompt notification of an event within this classification will be made to the NRC, State of New York and Monroe and Wayne Counties. While the initial assessment would not require immediate response, potential releases of radioactivity make it advisable to alert offsite organizations. Periodic status updates will be made to keep authorities aware of the situation.

3.4 Site Area Emergency:

A Site Area Emergency is characterized by events involving actual or probable major failures of plant functions needed for protection of the public or hostile action that results in intentional damage or malicious acts: (1) toward site personnel or equipment that could lead to the likely failure of equipment needed for the protection of the public; or (2) that prevent effectives access to equipment needed for the protection of the public. Most events within this classification constitute actual or clear potential for significant releases of radioactive material to the environment. For a Site Area Emergency, all emergency response facilities are activated. Although emergency actions involving members of the

Time Estimates contained in EP-AA-1012, Addendum 2. A summary of evacuation time estimates for various conditions is provided in EP-AA-1012, Addendum 2.

All surveys will be retained by the EOF Radiation Protection Manager. Formal reports shall be written and distributed as required by 10CFR20 and the Ginna Technical Specifications. Information concerning the offsite consequences of the incident and protective actions to protect the public will be coordinated in accordance with the New York State Radiological Emergency Plan and County Emergency Plans. A Company spokesperson in the JIC will release the information concerning the plant, plant safeguards and its employees, and assistance being provided to State and local authorities.

Severe Accident Management Guidelines (SAMG) entry conditions are defined in the Station Emergency Operating Procedures.

4.5.2 Offsite Authorities Actions:

All actions of paragraph 4.9.6 for Site Area Emergency will be reviewed and enacted for a General Emergency. All emergency personnel will have been activated and all response centers are operating. Information is evaluated and forwarded to the proper authorities and the public. Protective actions will be instituted as needed for the public and milk animals.

4.6 Activation of Emergency Response Organization:

Emergency procedures necessary to cope with the plant system malfunction will be implemented. All on-duty operations personnel will report to the Control Room. Control Room ventilation dampers will be switched from outside to inside air and the charcoal filters will be put into service.

Plant Security:

During a plant evacuation, the plant security officers assist in the activation of the plan as follows:

- The Security Shift Supervisor will deploy resources to restrict access to the owner controlled area during an Alert or higher. They will inform the TSC Security Coordinator or Corporate Emergency Director of any security issues.
- At least one security officer will remain in the Access Control Facility to instruct all evacuating personnel leaving the plant to proceed to the Training Center or alternate assembly area until released.

The security officers at the plant entrance will stop all personnel and their vehicles from entering the site and direct them to the Training Center or alternate assembly area until the TSC Security Coordinator or his designee notifies them that the condition has been corrected.

Radiation Protection:

The EOF Radiation Protection Manager shall assist the Corporate Emergency Director in evaluating the emergency. The TSC Radiation Protection Manager will report directly to the Technical Support Center. Other Radiation Protection section personnel will:

a) Report to the Operations Support Center and assume responsibilities as stated in the implementing procedures.

- Radiation Protection personnel shall ensure that dosimeter readings of evacuated personnel who were in radiologically controlled areas of the plant are recorded.
- During off-duty hours, RP technicians shall report to their emergency response locations as stated in the implementing procedures. An on-shift RP Technician shall report to the Control Room and provide radiological assessment support as deemed necessary by the Shift Manager.

Off-Duty Personnel:

Off-duty personnel, upon notification, shall report to their emergency response locations, unless directed to their Alternate Facility.

4.7 Immediate Assessment:

The Shift Emergency Director (Shift Manager) shall immediately assess the incident. The Shift Emergency Director is responsible for the implementation of the Emergency Plan until command and control is transferred. The Shift Emergency Director will evaluate plant conditions by checking control and safeguards systems, plant data and radiation monitors. The Shift Emergency Director shall ensure all offsite agencies are notified in accordance with EP-CE-114-100and that the following information is given:

a) Name of facility and communicator

b) Date/time of incident

c) Class of Emergency (Unusual Event, Alert, Site Area Emergency, General Emergency)

d) Brief Description of Event

e) Radioactive Material Release (None, Atmospheric, Ground, Lake)

f) Protective Actions Recommended for appropriate population

g) Temperatures and wind speed and direction

The Wayne County Emergency Management Office and the Monroe County Office of Emergency Management will be notified at the same time through the use of the New York State Radiological Emergency Communications System (RECS). An Emergency Communicator is part of each shift and will maintain contact with New York State and the counties during an emergency. As the RECS line is a closed system, call-back verification by the State and counties is not necessary. The Communicators will also maintain communications with the NRC via the Emergency Notification System (ENS).

If necessary, the Shift Emergency Director shall issue radiation protection equipment and dispatch an RP Technician team to conduct in-plant or area surveys. Prior to augmentation, the Ginna RP Technicians are dedicated to on-site activities. If necessary, a relief schedule will be determined. (See Radiation Protection During an Emergency, Section 4.9.1).

4.8 Subsequent Actions:

To ensure that immediate and direct action is taken in an emergency situation, the Technical Support Center, Operations Support Center and the assembly area in the Training Center or Warehouse will be staffed. Details for staffing are in the implementing procedures. During normal working hours, individuals assigned to the Technical Support Center and the Operations Support Center will go there directly.

During off-duty hours, upon notification of an emergency through the call out procedure, personnel may report to the TSC and OSC using normal procedures unless directed to their Alternative Facility.

The Station Emergency Director shall assume responsibility for the activation of onsite Emergency Centers and establish contact with the Control Room. The Station Emergency Director will request from the on-duty Shift Manager an evaluation of plant conditions and all data which has been relayed to the state in preparation for assuming command and control.

The EOF Radiation Protection Manager will dispatch offsite monitoring teams to areas of concern and request each team to report by telephone or radio.

The Corporate Emergency Director will report conditions to company management.

The Corporate Emergency Director will evaluate radiological data and plant parameters. Current conditions and follow-up actions will be reported to management periodically. The New York State officials and Monroe County and Wayne County Directors of Emergency Management will be kept advised of changing conditions.

Follow-up messages to offsite authorities will contain the following information as appropriate:

a) Location, name of caller

b) Class of emergency and date and time of incident

c) Type of actual or projected release, estimated duration and impact time

d) Estimated quantity of release for various materials

e) Chemical and physical form of release material (noble gases, iodine, particulate)

f) Current weather conditions

g) Actual or projected dose rate and time integrated dose at site boundary

h) Projected dose rate and integrated doses in affected sectors

i) Estimation of any surface radioactive contamination

j) Recommended emergency response actions or protective measures

k) Prognosis for course of the event

l) Status of in-plant emergency actions, and licensee response

is the responsibility of the TSC Radiation Protection Manager or the EOF Radiation Protection Manager. Approval of the Shift Emergency Director or Station Emergency Director is required.

Radio-protective drugs will be issued for the general public only if approved by the New York State Department of Health.

4.9.4 Search and Rescue:

Following site evacuation, all personnel will be accounted for using security records, sign-in sheets, log sheets, etc. If individuals are not accounted for, the Station Emergency Director will initiate search and rescue operations to locate unaccounted for individuals.

The search and rescue team will consist of at least two persons including a Radiation Protection technician.

The search should start at the last known location or work assignment of the unaccounted-for individual. Radiation surveys should be made as the team progresses. It may be necessary to administer first aid to the individual after he or she is located. The Corporate Emergency Director Station Emergency Director. or Control Room shall be advised of the situation.

4.9.5 Decontamination:

A Radiation Protection procedure provides guidance for graduated measures to be used for decontamination. The objective of decontamination is to prevent the spread of radioactive material on the individual, to the environment or to other personnel and to reduce the resultant dose. Decontamination is essentially the removal of radioactive material and is performed starting with the highest level of contamination using the simplest procedures. Continued decontamination may show diminishing effectiveness and require a decision to stop or use more potent agents.

Decontamination kits, which contain items to decontaminate the skin and for wound cleansing, are available. Decontamination should continue until it is no longer effective but not so as to abrade skin. This procedure should be effective against iodine and other contaminants.

If personnel cannot be decontaminated to the limits of Procedure RP-AA-350, “Personnel Contamination Monitoring, Decontamination and Reporting”, Radiation Emergency Assistance Center/Training Site (REAC/TS) may be contacted.

Instruments are available to determine contamination levels of personnel or equipment and the effectiveness of decontamination. Waste drums are available as containers for radioactive waste and emergency clothing is available, if needed.

4.9.6 Offsite Authorities Actions:

Offsite authorities will provide assistance as needed to protect the public. In the event a Site Area Emergency is declared, this may include activating the public notification system and providing information and periodic updates of the situation through the EAS (Emergency Alert System) and/or press briefings.

4.11 Public Relations:

Public information will be released by a Company spokesperson operating from the Joint Information Center. Public information personnel will be assisted by a JIC Director who keeps in contact with the Corporate Emergency Director and EOF operations. Company personnel will exchange information with government Public Information officers on a timely basis. All news releases will be coordinated among Federal, State, County and Company sources.

The Company communications department will be notified of any activation of this plan beginning at the Unusual Event classification level. Initial notification at the Unusual Event will be from the Control Room using an automated notification system. Instructions for notifying public information personnel at higher classifications are contained in EP-CE-114-100, Emergency Notifications.

The Joint Information Center will be activated during a nuclear emergency at an Alert or more severe event. The Emergency Plan Implementing Procedures provide for staffing this Center and outline the duties of various positions. Individuals who are qualified to assume these positions are designated. Space is allocated in the Joint Information Center for use by various regulatory and government officials to coordinate and facilitate the flow of accurate information to the public. A Company spokesperson who has access to the EOF will be available to the news media for briefing and questions.

Information concerning plant employees is available through the Public Inquiry function located in the Joint Information Center.

Information concerning the status of the plant, employees and Protective Action Decisions is released by the public information officers representing the Company and Federal, State and local governments.

A public information program to acquaint the public with the proper actions to be taken in the event of a nuclear emergency at Ginna Station will be implemented on an annual basis. This program will provide information about radiation, protective actions which can be taken, suggested evacuation routes, assistance for those with special needs, proper responses to warning signals, and where additional information can be obtained. The program will be coordinated between Company, State and county officials, and consists of items such as printed calendars, brochures and, for Wayne County only, telephone directory instructions.

Material for placement in parks, motels and retail establishments to which transients have access will be provided on an annual basis.

An annual briefing and training session will be held to acquaint the news media with the Ginna Nuclear Emergency Response Plan and related government agency emergency plans. Information on plant operation, radiation effects and concerns, the implementation of our Emergency Plan, points of contact for the release of public information at the Company and other relevant topics will be kept current through these sessions.

If no release data is available, a method for assessment of release rates is used in conjunction with the X/Q values and offsite concentrations. The release rate of radioactive material from the plant can be calculated from the measured airborne concentration at a given downwind sample location and the X/Q value for that location. Field Team survey results can be used to back calculate doses at the site boundary and offsite.

The Manual of Protective Action Guides and Protective Actions for Nuclear Incidents (EPA 400-R-92-001), NUREG-0133, Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants (October 1978) and Regulatory Guide 1.109 Rev. 1, Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluation Compliance with 10 CFR Part 50, Appendix I (October 1977) provide the methodology for relating radiological measurements in various environmental media or effluent monitor readings to offsite dose or dose rates. Meteorological conditions can be factored into these calculations.

A computer program operating on a personal computer is available in the Control Room, and EOF. This system provides multiple methods of calculating downwind dose rates and airborne contamination levels.

The sophisticated computer program, which uses the methods for environmental dose calculations required by Federal regulations, is also available to assess doses during and after an emergency. Additional information on the radiological consequences of a variety of accidents can be found in Chapter 15 of the Ginna Updated Final Safety Analysis Report.

External dose or dose rates from surface contamination or airborne radioactivity are determined by direct field measurements (dosimeter or survey meter). Internal dose commitments from key isotopes via water or airborne pathways would be evaluated using the uptake rates, dose conversion factors, and other pathway parameters given in EPA 400, NUREG-0133 and Regulatory Guide 1.109. Computer software is available that uses these dose calculation models to determine the radiological dose assessment. In this manner, rapid determination of dose estimates from multiple pathways may be made for comparison with protective action guides.

A 1000-gallon holding tank is available to contain decontamination water from a sink and shower located at the Training Center. Decontamination water will be sampled prior to transfer, treatment or disposal.

5.4.6 Protective Equipment and Supplies:

Personnel entering the Controlled Area may be required to wear protective clothing. The nature of the work to be done governs the selection of protective clothing to be worn by individuals. The protective apparel available is shoe covers, head covers, gloves and coveralls. Additional items of specialized apparel such as plastic suits, face shields, and respirators are available for operations involving high levels of contamination. In all cases, Radiation Protection personnel shall evaluate the radiological conditions and specify the required items of protective clothing to be worn.

Respiratory protective devices are required wherever an airborne radiation area exists or is expected. In such cases, Radiation Protection personnel monitor the airborne concentrations and specify the necessary protective devices according to concentration and type of airborne contaminants present.

Available respiratory devices include full face air purifying respirators (filter type both negative and pressured powered air purifying units). Air-line supplied respirators of pressure demand type are used as well as constant flow hoods. Self-Contained Breathing Apparatus devices, using full face masks and pressure demand regulators, are also available.

Site specific ERO Respirator qualification requirements contained in the ERO Training and Qualification procedure take precedence over requirements contained in the Exelon Standardized Radiological Emergency Plan for Ginna Station.

For use in an emergency, equipment and supplies are located in the Control Room, Technical Support Center, and the Training Center. Equipment categories are given in 5.1.8.

5.4.7 Emergency Vehicles:

In the event it becomes necessary to make use of automotive equipment, a number of vehicles will be available. These include a variety of company-owned vehicles assigned to the Station. Lastly, a large and diverse fleet of vehicles is available from the Company vehicle fleet.

5.5 First Aid and Medical Facilities:

First aid and medical provisions include both onsite and offsite facilities. The latter are described in Section 2.3, Augmentation of the Emergency Organization. A dispensary onsite contains sinks, a bed, a stretcher, and miscellaneous first aid equipment and supplies. Decontamination supplies can be obtained from the Radiation Protection group. Personnel decontamination supplies and bioassay collection kits are available at Rochester General Hospital and Newark-Wayne Community Hospital.

Auxiliary Operators are trained in first aid procedures using Red Cross Multi-Media or an equivalent program. An administrative procedure establishes a First Aid Team and the actions to be followed in the event of illness or injury at Ginna Station.

Section 6: Maintaining Nuclear Emergency Preparedness

Formalized training program(s) have been established to ensure that all personnel who actively participate in the Nuclear Emergency Plan maintain their familiarity with the plan and their required response. A radiation emergency exercise shall be conducted at least annually, with emphasis placed upon orderly implementation of the emergency plan.

It is the Company management's expectation that responders will respond immediately upon being notified and not wait for additional time. This expectation is reinforced as part of the responder training.

Personnel trained for onsite response to a radiation emergency are part of the regular plant staff and are trained to specific responsibilities within the emergency organization. Training is documented by the Manager, Emergency Preparedness and the Emergency Preparedness Staff. Any emergency plan work by consultants will be under the control of, and reviewed by, the Manager, Emergency Preparedness.

Exercises shall be evaluated by the Manager, Emergency Preparedness and reviewed by the Emergency Preparedness Station and Corporate Management, thereby assuring the effectiveness of the plan throughout the lifetime of the R. E. Ginna facility.

6.1 Training and Drills:

Training classes on the emergency plan shall be conducted once per calendar year not to exceed 18 months between training sessions for all Ginna emergency response personnel who may actively participate in the radiation emergency plan. Details of the training programs are established in Exelon ERO Training and Qualification procedure. Training will include a demonstration of their ability to perform the functions to which they may be assigned by participating in a Drill or Exercise at least once every two years. During drills, on-the-spot corrections of erroneous performance may be made, followed by a critique or corrective action.

Provisions must be made to start a drill or exercise between 6:00 p.m. and 4:00 a.m. at least once in every eight-year cycle. Some drills or exercises should be unannounced.

Specialized training will be provided for:

1. Technical Support Center assignees
2. Operations Support Center assignees
3. First Aid Teams
4. Offsite/Onsite Field Monitoring Personnel
5. Emergency Operations Facility personnel
6. Security personnel
7. Local Emergency Support Services personnel
8. Fire Brigade personnel
9. Dose Assessment personnel

10. Core Damage Assessment personnel
11. JIC personnel
12. On-Shift Radiation Protection technicians
13. Onsite Field Monitoring Personnel
14. Severe Accident Management Evaluators and Decision-Makers

6.1.1 Emergency Director:

Training of Emergency Directors will be given annually to the personnel who fill the Corporate, Station, and Shift Emergency Director positions. This training will cover responsibilities, communications, emergency classifications, protective action recommendations, and review of all procedures pertinent to their respective duties under the Emergency Plan. The necessary lesson plans and training documents are developed in accordance with Exelon procedures and processes.

6.1.2 Offsite/Onsite Monitoring Teams:

Field Monitoring Team Training will be given to selected personnel. Training material will cover Radiation Protection practices and techniques utilized during radiation monitoring, Field Monitoring Team equipment and its use, radio communication techniques, monitoring and sampling procedures, survey routes and sample points, contamination and decontamination considerations, and review of implementing procedures used by Field Monitoring Teams. Field training will be given as needed.

6.1.3 Special Training for Participating Agencies:

Annual training will be provided to offsite support agencies, State and counties on EALs/PARs and other pertinent topics.

Training shall also be provided at least annually for but not limited to the following groups:

a) Ontario Volunteer Fire Company
b) Ontario Volunteer Emergency Squad
c) Rochester General Hospital
d) Newark-Wayne Community Hospital

Training for these groups consists of lectures concerning their required involvement during radiation emergencies, procedures for notification, and basic radiation protection.

6.1.4 Drills and Exercises:

The ERO Training and Qualification procedure establishes the training program which develops and maintains the proficiency of emergency response personnel. This program meets the requirements of 10CFR50 Appendix E Section IV F regarding responding to emergencies. Through the initial training program and annual drills, personnel will be familiarized with the intent of the plan and the content of implementing procedures. Key personnel will be trained in the specific

- Emergency Response Organization (ERO) - Organization put in place to respond to declared events. The ERO replaces normal plant organization when activated and remains in control until the event is terminated. The ERO is made up of the following sub-groups:
  - On-Shift Personnel - minimum number of shift personnel filling positions identified in Shift Staffing Assessment.
  - Minimum Staffing - The minimum number of ERO members that must be staffed within one hour whenever the Technical Support Center, Operations Support Center, Emergency Operations Facility and the Joint Information Center are required to activate.
- Hostile Action - An act toward a nuclear power plant or its personnel that includes the use of violent force to destroy equipment or take hostages, and/or that intimidates the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, projectiles, vehicles or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. Hostile action should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the nuclear power plant. Non-terrorism-based Emergency Action Levels (EALs) should be used to address such activities (e.g., violent acts between individuals in the Owner Controlled Area).
- Joint Information Center - Located at 1255 Research Forest, Macedon, NY, it has facilities for press briefings, public inquiry and general information dissemination. Information regarding the status of Ginna Station will come from the EOF.
- Local State of Emergency - May be declared by a county executive in the event that public safety is imperiled by a disaster or public emergency. Following such a declaration, the county executive may promulgate local emergency orders to protect life and property or to bring the emergency under control. Actions may include prohibition or control of vehicular traffic, closing of public facilities and suspension of local ordinances. (Further details provided in NYS Executive Law Article 2-B.)
- Operations Support Center (OSC) - Located in the Ginna Administration Building's Outage Control Center where personnel qualified to support the Operations needs of the plant will be assigned.
- Protective Action Recommendation (PAR) - Recommendation by the licensee to County and State officials to shelter or evacuate members of the general public based upon plant conditions or projected radiological doses.
- Radiological Emergency - An incident that may result in the uncontrolled release of radioactive material leading to a hazard or potential hazard to the health and safety of the general public. As a result, the Ginna Emergency Organization, the Company recovery organization, and State and county emergency organizations may be activated, depending upon the level of response required.

Appendix 1

NUREG-0654 Evaluation Criteria Cross Reference

NUREG-0654 Reference	Criteria	Plan Reference Section No.
A1 – Item a	Identification of Response Organizations	2.3
A1 – Item b	Organization of Concept of Operations	1.1, 1.2
A1 – Item c	Organizational Inter-Relationships - Block Diagrams	Fig. 2.1
A1 – Item d	Designation of Organization Director	1.1, 2.2
A1 – Item e	24 Hour Response/Communication	5.2
A2 – Item a	Organization Authority	N/A (not required in Licensee Plans)
A2 – Item b	Legal Basis for Organization Authority	N/A (not required in Licensee Plans)
A3	Formal Intra-government/Organization Agreements	Appendix 2
A4	Designated Authority for Organization Resource Continuity	2.2
B1	Provision for Onsite Shift Emergency Organization	2.1, 2.2
B2	Designation of Onsite Emergency Director	2.2
B3	Line of Succession for the Emergency Director	EP-AA-1000, Section II.B
B4	Functional Responsibilities of the Emergency Director	3.5, 2.2, 4.5.1, 4.8, EP-AA-1000, Section II.B
B5	Assignment of On-Site Emergency Personnel	2.1, 2.2, 6.0, EP-AA-1000, Section II.B
B6	Onsite Emergency Organization Interface	2.2, 5.1, 7.1, EP-AA-1000, Section II.B
B7	Designation of Minimum Staffing Requirements for Plant Emergencies	EP-AA-1000, Section II.B
B7 – Item a	Logistics Support for Emergency Personnel	EP-AA-1000, Section II.B
B7 – Item b	Technical Support for Planning/Re-entry/Recovery Operations	EP-AA-1000, Section II.B

Appendix 1

NUREG-0654 Evaluation Criteria Cross Reference

B7 – Item c	Management Level Interface with Governmental Authorities	EP-AA-1000, Section II.B
B7 – Item d	Information/Press Releases	4.11
B8		2.4, 2.5
B9	Designation/Responsibility/Limitations of Local Agency Assistance	2.3, 2.5, Appendix 2
C1 – Item a	Authority to Request RAP/IRAP Resources	2.2, 4.5, 5.2.5
C1 – Item b	Federal Resources Expected and Time of Arrival	2.3.4
C1 – Item c	Specify Support Available to Federal Response	2.3.4
C2 – Item a	Organization Representative at Near-Site Emergency Operations Facility	N/A (not required in Licensee Plans, see State & County Plans)
C2 – Item b	Licensee Representative at Governmental EOC	4.8
C3	Radiological Laboratory Capabilities	2.5.9
C4	Nuclear Assistance Sources	2.3, 2.4, 2.5
D1	Facility Emergency Classification System	3.0
D2	Initiating Conditions	
D3	State and Local Emergency Classification System	N/A (not required in Licensee Plans, see State & County Plans)
D4	State and Local Procedures	N/A (not required in Licensee Plans, see State & County Plans)
E1	Bases for Notification/Verification	3.0
E2	Personnel Notification/Alert/Mobilization Procedures	4.3
E3	Contents of Initial Plant Emergency Messages	4.7
E4	Provisions for Content of Plant Follow-up Messages	4.8
E5	Dissemination of Information from Plant Operators	N/A (not required in Licensee Plans, see State & County Plans)
E6	Means for Population Notification	5.3.13
E7	Provision for Written Public Instruction Messages	4.5

Appendix 1

NUREG-0654 Evaluation Criteria Cross Reference

F1 – Item a, b, c, d, f	24-Hour Notification/Activation of Emergency Response Network	5.2.5
F1 – Item e	Alerting Ginna Emergency Personnel	4.6
F2	Communications with Medical Support Facilities	2.5
F3	Periodic Communications System Testing	5.2
G1	Public Emergency Education/Information	4.11
G2	Public Emergency Education Program	4.11
G3	Public Information Control Point	5.1.5
G4 – Item a	Designated Public Information Spokesperson	4.11
G4 – Item b	Timely Exchange Among Spokespersons	EP-AA-1000, Section II.B
G4 – Item c	Arrangements for Rumor Control	EP-AA-1000, Section II.B
G5	News Media Education Program	4.11
H1	NUREG-0696 Technical & On-site Operations Support Centers	5.1.2, 5.1.3
H2	Near-Site Emergency Operations Facilities	5.1.4, 5.1.5
H3	State & Local Emergency Operations Center	N/A (not required in Licensee Plans, see State & County Plans)
H4	Provision for Activation/Staffing of Facilities	4.3
H5	Onsite Monitoring Systems	5.3.1 - 5.3.8, 5.3.10, 5.3.14
H6 – Item a	Offsite Geophysical Phenomena Monitors	5.3.8
H6 – Item b	Off-site Radiological Monitors/Dosimetry	5.3.7, 5.3.11
H6 – Item c	Laboratory Facilities	5.3.9
H7	Off-site Radiological Monitoring Equipment	5.3.10, 5.3.11
H8	Provision for Meteorological Instrumentation/Procedures	5.3.10
H9	Provision for On-site Operations Support Center	5.1.3
H10	Inspection/Inventory/Calibration of Emergency Equipment/Instruments	5.3.12, 6.3
H11	Categories of Emergency Equipment	5.1.8

Appendix 1

NUREG-0654 Evaluation Criteria Cross Reference

J10 – Item l	Evacuation Time Estimates for EPZ	EP-AA-1012, Addendum 2
J10 – Item m	Basis for Protective Actions used in EPZ during Emergency Conditions	Table 4.1
J11	Protective Measures for the Ingestion Pathway	N/A (not required in Licensee Plans, see State & County Plans)
J12	Registration & Monitoring of Evacuees	N/A (not required in Licensee Plans, see State & County Plans)
K1 – Item a	Exposure Guidelines for the Removal of Injured Persons	4.9.1
K1 – Item b	Exposure Guidelines for the Undertaking of Corrective Actions	4.9.1
K1 – Item c	Exposure Guidelines for Performing Assessment Actions	4.9.1
K1 – Item d	Exposure Guidelines for Providing First Aid	4.9.1
K1 – Item e	Exposure Guidelines for Providing Personnel Decontamination	4.9.5
K1 – Item f	Exposure Guidelines for Providing Ambulance Service	4.9.1
K1 – Item g	Exposure Guidelines for Providing Medical Treatment Services	4.9.1
K2	Onsite Radiation Protection Program	4.9.1
K3	24-Hour Dosimetry Service	4.9.1
K4	Authorization for Personnel Exposure in Excess of the Protective Action Guides	N/A (not required in Licensee Plans, see State & County Plans)
K5	Determination of Need for Decontamination	4.9.5
K6	Onsite Controls	5.4.5
K7	Capability for Decontamination of Relocated Onsite Personnel	4.9.5
L1	Ability of Medical/Health Services to Evaluate Radiation Exposure/Handle Contaminated Individuals	2.5.2, 2.5.4-2.5.7, 5.5
L2	Onsite First Aid Capability	4.9.3

Appendix 1

NUREG-0654 Evaluation Criteria Cross Reference

L3	Identification of Medical Services Facilities Equipped/Trained to Treat Radiological Accident Victims	N/A (not required in Licensee Plans, see State & County Plans)
L4	Transportation to Medical Facilities	2.5.2
M1	Plans for Recovery/De-escalation of Protective Measures	7.0, 7.1
M2	Designation of Facility Recovery Organization	7.1
M3	Notification of Recovery Operation Initiation	7.1
M4	Methodology for Periodic Exposure Estimate	5.3.3
N1 – Item a	Drills to Simulate Offsite Releases	6.1.4
N1 – Item b	Drills to Test All Elements, Time, & Weather Conditions	6.1.4
N2 – Item a	Communication Drills	6.1.4, 6.2
N2 – Item b	Fire Drills	6.1.4
N2 – Item c	Medical Emergency Drills	2.5.2, 2.5.4, 2.5.5
N2 – Item d	Radiological Monitoring Drills	6.1.4
N2 – Item e	Health Physics Drill	6.1.4
N3	Drill Scenarios	6.1.4
N4	Official Observers/Critique	6.1.4
N5	Improvements/Corrective Actions	6.1.4
O1 – Item a	Onsite Emergency Response Training for Offsite Emergency Organizations	6.1.3
O1 – Item b	Offsite Emergency Response Organization Training	N/A (not required in Licensee Plans, see State & County Plans)
O2	Onsite Training/Corrective Actions	6.1
O3	Onsite First Aid Team Training	4.9.3
O4	Response Personnel Training	6.1
O5	Annual Retraining of Personnel	6.1
P1	Planning Personnel Training	6.1.5
P2	Designation of Planning Authority	1.1
P3	Designation of Emergency Planning Coordinator	1.1
P4	Annual Review and Update of Response Plan	6.2

Appendix 1

NUREG-0654 Evaluation Criteria Cross Reference

P5	Provisions for Plan Distribution and Promulgation of Plan Revisions	6.2
P6	Listing of Supporting Plans	Appendix 4
P7	Procedures for Plan Implementation	Appendix 3
P8	Table of Contents	Page 1
P9	Independent Audit of Emergency Preparedness Program	6.4
P10	Updating of Telephone Numbers	6.2

EPIP #	Emergency Plan Implementing Procedures (EPIP)	E Plan Reference
A-7	Procedures for Handling Injuries/Medical Emergencies at Ginna Station	2.6, 5.5
EP-CE-113	Personnel Protective Actions	4.4, 4.5.1, 5.2.1, 5.3, 5.4 4.9.1, 4.9.3
EP-AA-112-500-F-54	GNP Offsite Monitoring Team Guidance	5.3.3, 5.3.11
EP-CE-111	Emergency Classification and Protective Action Recommendations	4.5.1
EP-CE-114-100	Emergency Notifications	1.3, 3.0, 3.2, 3.3, 4.2-4.5, 5.2.4, 5.2.5,
EP-AA-112-600	Public Information Organization	2.1, 2,2 , 4.11, 5.1, 5.1.5, EP-AA-1000, Section II.B
EP-AA-112-400	Emergency Operations Facility Activation and Operations	2.1, 2.2, 5.1, 5.1.4, 5.2.5, EP-AA-1000, Section II.B
EP-AA-112-100	Control Room Operations	2.1, 2.2, 5.1, 5.1.1, 5.2.5, EP-AA-1000, Section II.B
EP-AA-112-200	TSC Activation and Operations	2.1, 2.2, 5.1, 5.1.2, EP-AA-1000, Section II.B
EP-AA-112-300	Operations Support Center Activation and Operations	2.1, 2.2, 5.1, 5.1.3, EP-AA-1000, Section II.B
EP-CE-115	Termination and Recovery	7.0
EP-AA-110-203	GNP Dose Assessment	4.6, 5.3.3, 5.3.11,

License Amendment Request

ENCLOSURE 1 - ATTACHMENT 1C

Assessment of R.E. Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed

1.0 SUMMARY DESCRIPTION

This enclosure provides a summary Table of the Emergency Response Organization (ERO) positions that are being removed from the Emergency Plan along with an assessment of their respective Emergency Plan tasks as defined in the Emergency Plan. The duties of the ERO positions being relocated to Emergency Plan Implementing Procedures (EPIPs) were reviewed against the NUREG-0654 guidance (both Revision 1 and draft Revision 2), and the station Emergency Plan. Each relocated ERO position was analyzed to ensure key tasks of the position are retained within the Emergency Plan and performed by Minimum Staff ERO members. The tasks were also evaluated against the NUREG-0654 guidance to ensure regulatory requirements were maintained.

The Table provides a description of each Full-Augmentation position as well as the responsibilities assigned under the station Emergency Plan. Each responsibility is assessed against the key Emergency Plan functions to ensure the Emergency Plan can still be implemented with the relocation of the responsibility to an EPIP. In some cases, a responsibility is identified as needed to support an Emergency Plan Function and subsequently reassigned to a Minimum Staff position.

The Full-Augmented Staff will continue to be available and respond to emergency conditions. The Full-Augmented Staff continue to be notified to respond to their respective Emergency Response Facilities (ERFs) at an Alert or higher Emergency Classification Level (ECL). They will be notified at the same time as the Minimum Staff personnel; however, the Full-Augmentation ERO response is not required to activate the ERF. Additionally, some ERO Full-Augmentation positions are designated as "as needed." These positions are trained and qualified to perform their Emergency Plan function; however, the position will be notified to report to their ERF only if conditions warrant, as determined by the Emergency Director or designee.

The Table is arranged in columns as described below:

Facility: This column identifies the affected Emergency Response Facility

TSC – Tech Support Center

OSC – Operations Support Center

EOF – Emergency Operations Facility

JIC – Joint Information Center

Current ERO Position: This column identifies the ERO position title. Each ERO position is also identified with a unique abbreviation for reference throughout the table. For example, MDCC is for Main Control Room Damage Control Communicator.

Current E-Plan Minimum Staff: This column identifies those positions that are currently considered Minimum Staff in the current approved Emergency Plan, but are being reassigned as Full-Augmentation (i.e., Yes/No).

Tasks Defined by Station Emergency Plan: This column identifies the specific position tasks identified in the Emergency Plan and EP Implementing Procedures. Each task is identified with a unique task ID number for quick reference throughout the table.

Task Disposition (Eliminated/Reassigned To): This column identifies the disposition of those tasks assigned to a ERO position under this License Amendment Request. Each ERO task was evaluated and dispositioned as either Relocated to an EPIP or Reassigned to a Minimum Staff Position. Tasks that are reassigned designate the ERO member receiving the task.

Justification / Implementing Action: This column provides a conclusion as to why this change is acceptable. In some cases, for tasks not being reassigned, this column provides an action needed when the change is implemented.

Attachment 1C **Assessment of Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed**

Facilty	Current ERO Position	Current E-Plan Min Staff	Tasks defined by Station Emergency Plan	Task Disposition	Justification / Implementing action
TSC	Technical Manager	Yes	Manage the activities of the TSC engineering / technical staff.	Relocate to EP Implementing Procedure	Supervisory Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Ensure additional personnel and/or equipment is arranged for, as necessary.	Relocate to EP Implementing Procedure	Coordination Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Provide engineering support for accident detection and assessments.	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Develop mitigative strategies based on assessment of the event	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Analyze and develop extreme measures actions (SAMGs, EDMGs, §50.54(x) or suspend security controls)	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Provide input for facility briefs.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
TSC	Maintenance Manager	Yes	Direct the total onsite maintenance and equipment restoration effort.	Relocate to EP Implementing Procedure	Supervisory Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Determine adequacy of OSC staffing.	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.

Attachment 1C **Assessment of Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed**

Facilty	Current ERO Position	Current E-Plan Min Staff	Tasks defined by Station Emergency Plan	Task Disposition	Justification / Implementing action
			Coordinate repair and OSC team task information between the TSC and OSC.	Relocate to EP Implementing Procedure	Coordination Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Provide input for facility briefs.	Relocate to EP Implementing Procedure	Commincation Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
TSC	TSC Director	Yes	Activate the Facility	Task maintained in Emergency Plan	This task is maintained as a Minimum Staff responsibility. The task is transferred to the minimum staff Emergency Director
			Establish and maintain facility accountability	Relocate to EP Implementing Procedure	Supervisory Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Manage the operation of the facility.	Relocate to EP Implementing Procedure	Supervisory Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Review and ensure facility displays are maintained current.	Relocate to EP Implementing Procedure	Supervisory Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Coordinate ERO shift relief rosters for the on-site facilities.	Relocate to EP Implementing Procedure	Coordination Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Develop ERO shift relief rosters for the facility	Relocate to EP Implementing Procedure	Coordination Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.

Attachment 1C **Assessment of Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed**

Facilty	Current ERO Position	Current E-Plan Min Staff	Tasks defined by Station Emergency Plan	Task Disposition	Justification / Implementing action
			Coordinate integration of the NRC Site Team.	Relocate to EP Implementing Procedure	Coordination Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Arrange for logistics support	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Ensure flow of information within and between the emergency response facilities.	Relocate to EP Implementing Procedure	Oversight Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Provide input for facility briefs.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Coordinate TSC relocation.	Relocate to EP Implementing Procedure	Supervisory Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
TSC	**Computer Specialist**	No	Support the setup of systems and equipment within the facility.	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Monitor facility equipment (computer related and communications) to ensure adequate operation.	Relocate to EP Implementing Procedure	Monitoring Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Resolve any IT related malfunctions.	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.

Attachment 1C **Assessment of Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed**

Facilty	Current ERO Position	Current E-Plan Min Staff	Tasks defined by Station Emergency Plan	Task Disposition	Justification / Implementing action
TSC	Operations Incident Command Post Liaison	No	No specific tasks identified in the Emergency Plan, however the ICP Liaison provides, interprets and clarifies operational related information and station priorities between the ERO and the Incident Command.	Relocate to EP Implementing Procedure	Commincation Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
TSC	Rad Protection Incident Command Post Liaison	No	No specific tasks identified in the Emergency Plan, however the ICP Liaison assists the Incident Command Post, as requested, with radiological related information.	Relocate to EP Implementing Procedure	Commincation Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
TSC	Security Incident Command Post Liaison	No	No specific tasks identified in the Emergency Plan, however the ICP Liaison provides, interprets and clarifies security related information, and priorities between Station Security and Incident Command	Relocate to EP Implementing Procedure	Commincation Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
TSC	TSC Operations Communicator	No	Communicate key information between the facilities over the Operations Status Line.	Relocate to EP Implementing Procedure	Commincation Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Monitor assigned communication line and provide key information to facility staff.	Relocate to EP Implementing Procedure	Monitoring Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
TSC	MCR Operations Communicator	No	Communicate key information between the facilities over the Operations Status Line.	Relocate to EP Implementing Procedure	Commincation Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Monitor assigned communication line and provide key information to facility staff.	Relocate to EP Implementing Procedure	Monitoring Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
TSC	TSC Adminstrative Staff	No	Perform administrative and logistic support functions for facility personnel.	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.

Attachment 1C **Assessment of Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed**

Facilty	Current ERO Position	Current E-Plan Min Staff	Tasks defined by Station Emergency Plan	Task Disposition	Justification / Implementing action
			Establish and maintain facility accountability.	Relocate to EP Implementing Procedure	Monitoring Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
OSC	Assistant OSC Director	Yes	Coordinate between CR, OSC and TSC to set OSC team task priorities.	Relocate to EP Implementing Procedure	Coordination Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Participate with OSC team dispatch and control.	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Assemble and dispatch OSC and offsite monitoring teams.	Relocate to EP Implementing Procedure	Coordination Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Provide input for facility briefs.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
OSC	OSC Operations Communicator	No	Communicate key information between the facilities over the Operations Status Line.	Relocate to EP Implementing Procedure	Commincation Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Monitor assigned communication line and provide key information to facility staff.	Relocate to EP Implementing Procedure	Monitoring Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Display, monitor and trend plant data and event information on the facility display systems.	Relocate to EP Implementing Procedure	Monitoring Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.

Attachment 1C **Assessment of Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed**

Facilty	Current ERO Position	Current E-Plan Min Staff	Tasks defined by Station Emergency Plan	Task Disposition	Justification / Implementing action
OSC	OSC Team Tracker	No	Maintain Team Tracking Status display.	Relocate to EP Implementing Procedure	Record Keeping Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Participate with OSC team dispatch, control and tracking.	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Track and maintain communications with OSC teams.	Relocate to EP Implementing Procedure	Record Keeping Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
OSC	OSC Chemistry Lead	Yes	Manage OSC manpower needs.	Relocate to EP Implementing Procedure	Supervisory Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Assist with formation of OSC teams.	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Participate with OSC team dispatch and control.	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Provide technical support to dispatched OSC teams.	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
OSC	OSC Admin Staff	No	Perform administrative and logistic support functions for facility personnel	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.

Attachment 1C **Assessment of Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed**

Facilty	Current ERO Position	Current E-Plan Min Staff	Tasks defined by Station Emergency Plan	Task Disposition	Justification / Implementing action
OSC	Chemistry Personnel	Yes	Perform job duties as an OSC team member.	Relocate to EP Implementing Procedure	There are no specific EP related duties for the augmented Chemistry Technician. Chem Techs will be called in as the situation requires by the OSC Director.
EOF	EOF Operations Communicator	No	Communicate key information between the facilities over the Operations Status Line.	Relocate to EP Implementing Procedure	Commincation Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Monitor assigned communication line and provide key information to facility staff.	Relocate to EP Implementing Procedure	Monitoring Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
EOF	Logistics Manager	No	Ensure ERO personnel have been properly notified and are responding to the facility	Relocate to EP Implementing Procedure	Supervisory Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Oversee staffing of EOF and assist with staffing for other facilities	Relocate to EP Implementing Procedure	Oversight Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Develop ERO shift relief rosters for the facility	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Coordinate ERO shift relief rosters for all facilities and the notification of personnel.	Relocate to EP Implementing Procedure	Coordination Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Manage the administrative support staff.	Relocate to EP Implementing Procedure	Supervisory Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.

Attachment 1C **Assessment of Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed**

Facilty	Current ERO Position	Current E-Plan Min Staff	Tasks defined by Station Emergency Plan	Task Disposition	Justification / Implementing action
			Review and ensure facility displays are maintained current..	Relocate to EP Implementing Procedure	Oversight Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Manage the procurement and logistical support activities for the on-site and off-site emergency response personnel and facilities.	Relocate to EP Implementing Procedure	Managing Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Monitor and maintain access controls for the facility	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Communicate with and coordinate support for ERO responders or plant personnel sent off-site to relocation areas.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Coordinate with the Nuclear Duty Officer to maintain communications with ANI, DOE, and INPO.	Relocate to EP Implementing Procedure	Coordination Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Provide input for facility briefs.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
EOF	EOC Communicator	No	Monitor plant conditions and event response activities.	Relocate to EP Implementing Procedure	Monitoring Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Provide information updates to and address questions and support requests from the off-site liaisons..	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.

Attachment 1C **Assessment of Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed**

Facilty	Current ERO Position	Current E-Plan Min Staff	Tasks defined by Station Emergency Plan	Task Disposition	Justification / Implementing action
			Communicate actions being considered or taken by counties and state to the EOF.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Provide input for facility briefs.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
EOF	Environmental Coordinator	Yes	Direct and track Offsite Monitoring Team activities.	Task maintained in Emergency Plan	This task is maintained as a Minimum Staff responsibility. The task is transferred to the minimum staff Rad Protection Manager
			Coordinate activities with the external agency field monitoring teams.	Relocate to EP Implementing Procedure	Coordination Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Establish and maintain OMT communications.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Maintain and update the radiological status displays.	Relocate to EP Implementing Procedure	Record Keeping Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Coordinate the receipt, analysis, storage and transfer of field monitoring samples.	Relocate to EP Implementing Procedure	Coordination Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Record and report field monitoring survey, sample and exposure information.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.

Attachment 1C **Assessment of Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed**

Facilty	Current ERO Position	Current E-Plan Min Staff	Tasks defined by Station Emergency Plan	Task Disposition	Justification / Implementing action
EOF	State Liaison	No	Communicate EOC / ICP actions and decisions to the EOF.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Provide technical support and information to the EOC / ICP.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
EOF	County Liaison	No	Communicate EOC / ICP actions and decisions to the EOF.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Provide technical support and information to the EOC / ICP.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
EOF	EOF Director	Yes	Activate the Facility.	Task maintained in Emergency Plan	This task is maintained as a Minimum Staff responsibility. The task is transferred to the minimum staff EOF Emergency Director.
			Manage the operation of the facility.	Relocate to EP Implementing Procedure	Managing Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Coordinate for continual shift staffing requirements as needed.	Relocate to EP Implementing Procedure	Coordination Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Coordinate integration of the NRC site team.	Relocate to EP Implementing Procedure	Coordination Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.

Attachment 1C **Assessment of Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed**

Facilty	Current ERO Position	Current E-Plan Min Staff	Tasks defined by Station Emergency Plan	Task Disposition	Justification / Implementing action
			Prepare State/Local notification forms and obtain Corporate ED approval to support the completion of timely offsite event notifications.	Task maintained in Emergency Plan	This task is maintained as a Minimum Staff responsibility. The task is transferred to the minimum staff State and Local Communicator
			Participate in the Inter-Facility briefing to communicate and obtain event and response information.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Provide input for facility briefs.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
EOF	Dose Assessor	No	Perform dose assessment.	Task maintained in Emergency Plan	This task is maintained as a Minimum Staff responsibility. The task is transferred to the minimum staff EOF Dose Assessment Coordinator.
			Monitor, evaluate and communicate conditions involving any release of radioactivity.	Task maintained in Emergency Plan	This task is maintained as a Minimum Staff responsibility. The task is transferred to the minimum staff EOF Dose Assessment Coordinator.
			Evaluate conditions and determine recommendations for PARs.	Task maintained in Emergency Plan	This task is maintained as a Minimum Staff responsibility. The task is transferred to the minimum staff Dose Assessment Coordinator.
EOF	EOF HPN Communicator	No	Provide event data and plant information to the NRC via the HPN	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Monitor assigned communication line and provide key information to facility staff.	Relocate to EP Implementing Procedure	Monitoring Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.

Attachment 1C **Assessment of Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed**

Facilty	Current ERO Position	Current E-Plan Min Staff	Tasks defined by Station Emergency Plan	Task Disposition	Justification / Implementing action
EOF	EOF Administrative Staff	No	Assist with completing ERO shift relief.	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Assist with setting up EOF equipment in preparation for facility activation.	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Perform administrative and logistic support functions for facility personnel.	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
EOF	Technical Advisor	Yes	Track and trend critical parameters.	Relocate to EP Implementing Procedure	Monitoring Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Monitor plant status and Control Room activities.	Relocate to EP Implementing Procedure	Monitoring Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Provide input for facility briefs.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
JIC	Technical Advisor	Yes	Provide technical expertise to the JIC staff.	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Assist the News Writer with development of technically accurate media statements.	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.

Attachment 1C **Assessment of Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed**

Facilty	Current ERO Position	Current E-Plan Min Staff	Tasks defined by Station Emergency Plan	Task Disposition	Justification / Implementing action
			Provide answers to technical questions from the news media regarding the emergency situation.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Periodically monitor EOF/TSC briefings and Operations Status Line to obtain information.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Provide technical information support to the Company Spokesperson.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Monitor event information on the facility display systems.	Relocate to EP Implementing Procedure	Monitoring Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Provide input for facility briefs.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
JIC	Media Monitor / Rumor Control Coordinator	Yes	Supervise media monitoring and Inquiry Phone Team personnel.	Relocate to EP Implementing Procedure	Supervisory Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Review Media Monitoring team information for trends, misinformation and rumors.	Relocate to EP Implementing Procedure	Monitoring Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Review Phone Team information for trends, misinformation and rumors.	Relocate to EP Implementing Procedure	Monitoring Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.

Attachment 1C **Assessment of Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed**

Facilty	Current ERO Position	Current E-Plan Min Staff	Tasks defined by Station Emergency Plan	Task Disposition	Justification / Implementing action
			Ensure adequate staff is available to perform media monitoring and phone team functions.	Relocate to EP Implementing Procedure	Supervisory Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Provide input for facility briefs.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
JIC	Logistics Manager JIC	Yes	Manage the administrative support staff.	Relocate to EP Implementing Procedure	Supervisory Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Develop ERO shift relief rosters for the facility.	Relocate to EP Implementing Procedure	Supervisory Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Arrange for logistics support.	Relocate to EP Implementing Procedure	Supervisory Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Oversee set-up and testing of JIC equipment.	Relocate to EP Implementing Procedure	Supervisory Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Maintain access control to the JIC.	Relocate to EP Implementing Procedure	Record Keeping Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Provide input for facility briefs.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.

Attachment 1C **Assessment of Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed**

Facilty	Current ERO Position	Current E-Plan Min Staff	Tasks defined by Station Emergency Plan	Task Disposition	Justification / Implementing action
			Oversee collection of technical data and station activities for drafting Media Statements and answering JIC questions.	Relocate to EP Implementing Procedure	Supervisory Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Coordinate preparation, review and distribution of Media Statements.	Relocate to EP Implementing Procedure	Coordination Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Obtain Corporate ED approval for the technical content of Media Statements.	Relocate to EP Implementing Procedure	Coordination Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Keep JIC staff informed of plant status and EXELON emergency response activities.	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
JIC	JIC Security	No	Provide badging and access controls for the facility.	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
JIC	Media Liaison	No	Ensures media is informed of protocol and schedules established for media briefings	Relocate to EP Implementing Procedure	Communication Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Coordinate preparations for media briefings.	Relocate to EP Implementing Procedure	Coordination Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Distribute media statements to the media in the media briefing area.	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.

Attachment 1C **Assessment of Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed**

Facilty	Current ERO Position	Current E-Plan Min Staff	Tasks defined by Station Emergency Plan	Task Disposition	Justification / Implementing action
			Coordinate media relations in JIC and update media between press conferences.	Relocate to EP Implementing Procedure	Coordination Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Coordinate special interviews and facility tours for the media.	Relocate to EP Implementing Procedure	Coordination Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
			Coordinate JIC briefing area preparation and establish briefing protocol.	Relocate to EP Implementing Procedure	Coordination Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
JIC	News Writer	No	Prepare draft Media Statements.	Relocate to EP Implementing Procedure	This task is maintained as a Minimum Staff responsibility. The task is transferred to the minimum staff JIC Director.
			Develop public information materials (bulletins, backgrounders and chronologies).	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.
JIC	Inquiry Phone Team	No	Monitor telephone lines for trends, misinformation and rumors.	Relocate to EP Implementing Procedure	This Rumor Control function is maintained as a Minimum Staff responsibility. The task is transferred to the minimum staff JIC Director.
			Respond to and log phone inquiries from the media and the public.	Relocate to EP Implementing Procedure	This Rumor Control function is maintained as a Minimum Staff responsibility. The task is transferred to the minimum staff JIC Director.
JIC	Media Monitoring Team	No	Monitor media coverage of the event for trends	Relocate to EP Implementing Procedure	Monitoring Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.

Attachment 1C **Assessment of Ginna ERO Minimum Staff and Full-Augmented Staff Positions Removed**

Facilty	Current ERO Position	Current E-Plan Min Staff	Tasks defined by Station Emergency Plan	Task Disposition	Justification / Implementing action
JIC	JIC Adminstrative Staff	No	Perform administrative and logistic support functions for facility personnel.	Relocate to EP Implementing Procedure	Assist Task - Position provides support for Min Staff, but task does not directly accomplish EP Function, major task or planning standard/element. As such, task can be managed in an EPIP and staffed as Full-Augmentation.

License Amendment Request

ENCLOSURE 2

Summary of Regulatory Commitments

SUMMARY OF REGULATORY COMMITMENTS

The following table identifies commitments made in this document. (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 Exelon's stations 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 (Simulator), 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 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	During station drill cycles.	No	Yes

COMMITMENT	COMMITTED ACTION OR "OUTAGE"	COMMITMENT TYPE	
		One-Time Action (Yes/No)	Programmatic (Yes/No)
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.			

License Amendment Request

ENCLOSURE 3

Information Related to Review of Proposed Changes by the State and Counties

State of New York Correspondence

August 15, 2018

Mr. Douglas Walker

Exelon Corporate Sr. Emergency Preparedness/Security Regulatory Analysis

Kennett Square, PA

Mr. Walker,

Doug,

The State of New York Division of Homeland Security & Emergency Services – Office of Emergency Management Radiological Emergency Preparedness Section (DHSES OEM REP) has reviewed the Exelon RE Ginna power plant proposed License Amendment Request (LAR); regarding the Emergency Staffing changes at Exelon RE Ginna power plant during a declared event.

New York State DHSES OEM REP Section acknowledges the changes as proposed by Exelon Corporate for the RE Ginna power plant.

Theodore J. Fisch

Theodore J. Fisch

NYS DHSES OEM REP Section Chief

County Correspondence

Wayne County
Monroe County

From: Gillard, Julie E:(GenCo-Nuc)
To: Walker, Douglas H:(GenCo-Nuc)
Subject: FW: Ginna ERO Staffing License Amendment Request - NY Review
Date: Tuesday, August 07, 2018 3:21:46 PM

Response from Wayne. Working to get NY State back.

From: EM- O'Toole, John [mailto:JOtoole@co.wayne.ny.us]
Sent: Tuesday, August 07, 2018 3:20 PM
To: Gillard, Julie E:(GenCo-Nuc); Gillard, Julie E:(GenCo-Nuc)
Subject: [EXTERNAL] RE: Ginna ERO Staffing License Amendment Request - NY Review

I'm fine with it and George say if I'm fine with it then he is too. No meeting necessary for the ERO staffing LAR.

John O'Toole
Rad Hazmat Officer
Wayne County Emergency Management
7376 Rt. 31 Suite 2000 Lyons NY 14489-9174
Phone: 315.946.5665
Fax: 315.946.9721
JOtoole@co.wayne.ny.us

Logo

From: Gillard, Julie E:(GenCo-Nuc) <julie.gillard@exeloncorp.com>
Sent: Tuesday, August 7, 2018 3:14 PM
To: EM- Bastedo, George <GBastedo@co.wayne.ny.us>; EM- O'Toole, John <JOtoole@co.wayne.ny.us>
Subject: FW: Ginna ERO Staffing License Amendment Request - NY Review

Hi George and John – I have heard back from the State and Monroe County. Would you like me to schedule a meeting to discuss?

From: Gillard, Julie E:(GenCo-Nuc)
Sent: Monday, August 06, 2018 8:20 AM
To: Kohlmeier , Tim (TimKohlmeier@monroecounty.gov); G Bastedo; GeorgeDorgan@monroecounty.gov; O'Toole, John; Fisch, Theodore (DHSES)
Subject: FW: Ginna ERO Staffing License Amendment Request - NY Review

Good morning all – Just a note to follow up on this request. I am happy to schedule a call with Doug Walker if that makes this easier to get through for you.
Please let me know.-

From: Fisch, Theodore (DHSES) <Theodore.Fisch@dhses.ny.gov>
Sent: Thursday, July 26, 2018 2:48 PM
To: Peterson, Alyse L (NYSERDA) <Alyse.Peterson@nyserda.ny.gov>; Frymire, Bridget <Bridget.Frymire@dps.ny.gov>; Costello, Cynthia A (HEALTH) <cynthia.costello@health.ny.gov>
Cc: Wisely, Kevin E (DHSES) <Kevin.Wisely@dhses.ny.gov>; Fisch, Theodore (DHSES) <Theodore.Fisch@dhses.ny.gov>; Lorette, Denise (DHSES) <Denise.Lorette@dhses.ny.gov>; Machina, Gary (DHSES) <Gary.Machina@dhses.ny.gov>; Gillard, Julie E:(GenCo-Nuc) <julie.gillard@exeloncorp.com>
Subject: [EXTERNAL] FW: Ginna ERO Staffing License Amendment Request - NY Review

Alyse, Bridget and Cindy,

FYI a review and comment on a License Amendment Request for Exelon RE Ginna, similar to the JAF/NMP review. If you have any comments please copy me on what you send to Julie Gillard, Exelon Sr. EP. Thanks, Ted

From: Gillard, Julie E:(GenCo-Nuc) [mailto:julie.gillard@exeloncorp.com]
Sent: Thursday, July 26, 2018 12:20 PM
To: G Bastedo <gbastedo@co.wayne.ny.us>; Kohlmeier , Tim (TimKohlmeier@monroecounty.gov) <TimKohlmeier@monroecounty.gov>; Fisch, Theodore (DHSES) <Theodore.Fisch@dhses.ny.gov>
Cc: O'Toole, John <JOtoole@co.wayne.ny.us>; GeorgeDorgan@monroecounty.gov; Lorette, Denise (DHSES) <Denise.Lorette@dhses.ny.gov>
Subject: Ginna ERO Staffing License Amendment Request - NY Review

Good afternoon George, Tim and Ted,

Attached for your review and comment is the License Amendment Request for Ginna to align their station Emergency Response Organizations with the draft NUREG 0654 Revision 2 guidance. The NRC would like us to share the changes with the affected states and counties prior to submittal and obtain and address any comments you may have.

Will you please send me an email acknowledging that you had the opportunity to review and provide any comments? I would be more than happy to coordinate a meeting with Doug Walker who is our subject matter expert on this topic if that would make it easier than looking at the documents. It took about ½ hour when we did the call for NMP/FitzPatrick with Oswego County and NYS.

If possible, we are looking for a response by AUGUST 10, 2018 to support our NRC

submittal date.

Thanks,
Julie

Julie Gillard
Sr. EP Specialist
Corporate Emergency Preparedness
Office: 315-349-1904
Cell: 315-592-8581

From: Gillard, Julie E:(GenCo-Nuc)
To: Walker, Douglas H:(GenCo-Nuc)
Subject: FW: [EXTERNAL] Re: FW: Ginna ERO Staffing License Amendment Request - NY Review
Date: Tuesday, August 07, 2018 3:02:56 PM

First one, two more to go.

From: TimKohlmeier@monroecounty.gov [mailto:TimKohlmeier@monroecounty.gov]
Sent: Tuesday, August 07, 2018 9:58 AM
To: Gillard, Julie E:(GenCo-Nuc)
Cc: GeorgeDorgan@monroecounty.gov
Subject: [EXTERNAL] Re: FW: Ginna ERO Staffing License Amendment Request - NY Review

Julie, we have received and reviewed the documents. We do not have any comments or concerns.

TK

Timothy Kohlmeier,
Deputy Public Safety Director, Public Safety Department
Emergency Manager, Office of Emergency Management
Monroe County
1190 Scottsville Rd.
Rochester NY, 14624
585-629-7187

From: "Gillard, Julie E:(GenCo-Nuc)" <julie.gillard@exeloncorp.com>
To: "Kohlmeier , Tim (TimKohlmeier@monroecounty.gov)" <TimKohlmeier@monroecounty.gov>, G Bastedo <gbastedo@co.wayne.ny.us>, "GeorgeDorgan@monroecounty.gov" <GeorgeDorgan@monroecounty.gov>, "O'Toole, John" <JOtoole@co.wayne.ny.us>, "Fisch, Theodore (DHSES)" <Theodore.Fisch@dhses.ny.gov>
Date: 08/06/2018 08:20 AM
Subject: FW: Ginna ERO Staffing License Amendment Request - NY Review

---

Good morning all – Just a note to follow up on this request. I am happy to schedule a call with Doug Walker if that makes this easier to get through for you.
Please let me know.-

From: Fisch, Theodore (DHSES) <Theodore.Fisch@dhses.ny.gov>
Sent: Thursday, July 26, 2018 2:48 PM
To: Peterson, Alyse L (NYSERDA) <Alyse.Peterson@nyserda.ny.gov>; Frymire, Bridget <Bridget.Frymire@dps.ny.gov>; Costello, Cynthia A (HEALTH) <cynthia.costello@health.ny.gov>
Cc: Wisely, Kevin E (DHSES) <Kevin.Wisely@dhses.ny.gov>; Fisch, Theodore (DHSES) <Theodore.Fisch@dhses.ny.gov>; Lorette, Denise (DHSES) <Denise.Lorette@dhses.ny.gov>; Machina, Gary (DHSES) <Gary.Machina@dhses.ny.gov>; Gillard, Julie E:(GenCo-Nuc) <julie.gillard@exeloncorp.com>
Subject: [EXTERNAL] FW: Ginna ERO Staffing License Amendment Request - NY Review

Alyse, Bridget and Cindy,

FYI a review and comment on a License Amendment Request for Exelon RE Ginna, similar to the JAF/NMP review. If

you have any comments please copy me on what you send to Julie Gillard, Exelon Sr. EP. Thanks, Ted

From: Gillard, Julie E:(GenCo-Nuc) [mailto:julie.gillard@exeloncorp.com]
Sent: Thursday, July 26, 2018 12:20 PM
To: G Bastedo <gbastedo@co.wayne.ny.us>; Kohlmeier , Tim (TimKohlmeier@monroecounty.gov) <TimKohlmeier@monroecounty.gov>; Fisch, Theodore (DHSES) <Theodore.Fisch@dhses.ny.gov>
Cc: O'Toole, John <JOtoole@co.wayne.ny.us>; GeorgeDorgan@monroecounty.gov; Lorette, Denise (DHSES) <Denise.Lorette@dhses.ny.gov>
Subject: Ginna ERO Staffing License Amendment Request - NY Review

Good afternoon George, Tim and Ted,

Attached for your review and comment is the License Amendment Request for Ginna to align their station Emergency Response Organizations with the draft NUREG 0654 Revision 2 guidance. The NRC would like us to share the changes with the affected states and counties prior to submittal and obtain and address any comments you may have.

Will you please send me an email acknowledging that you had the opportunity to review and provide any comments? I would be more than happy to coordinate a meeting with Doug Walker who is our subject matter expert on this topic if that would make it easier than looking at the documents. It took about ½ hour when we did the call for NMP/FitzPatrick with Oswego County and NYS.

If possible, we are looking for a response by AUGUST 10, 2018 to support our NRC submittal date.

Thanks,
Julie

Julie Gillard
Sr. EP Specialist
Corporate Emergency Preparedness
Office: 315-349-1904
Cell: 315-592-8581