September 18, 2003

Mr. John L. Skolds, President and Chief Nuclear Officer Exelon Nuclear Exelon Generation Company, LLC 4300 Winfield Road Warrenville, IL 60555

SUBJECT: CLINTON POWER STATION NRC INSPECTION REPORT 50-461/03-06(DRS)

Dear Mr. Skolds:

On August 22, 2003, the NRC completed an inspection at your Clinton Power Station. The enclosed report documents the inspection findings, which were discussed on August 21, 2003, with Mr. K. Polson and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel. Specifically, this inspection focused on emergency preparedness, including your staff's determinations of performance indicators for the Emergency Preparedness Cornerstone.

On the basis of the results of this inspection, no findings of significance were identified.

In accordance with 10 CFR Part 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <u>http://www.nrc.gov/reading-rm/adams.html</u> (the Public Electronic Reading Room).

Sincerely,

/RA/

Kenneth Riemer, Chief Plant Support Branch Division of Reactor Safety

Docket No. 50-461 License No. NPF-62

Enclosure: Inspection Report 50-461/03-06(DRS)

See Attached Distribution

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J. Skolds

cc w/encl: Site Vice President - Clinton Power Station Clinton Power Station Plant Manager Regulatory Assurance Manager - Clinton Chief Operating Officer Senior Vice President - Nuclear Services Vice President - Operations Support Vice President - Licensing and Regulatory Affairs Manager Licensing - Clinton and LaSalle Senior Counsel, Nuclear, Mid-West Regional Operating Group Document Control Desk - Licensing W. Curtis, FEMA Region V J. Skolds

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket No:	50-461
License No:	NPF-62
Report No:	50-461/03-06(DRS)
Licensee:	AmerGen Energy Company, LLC
Facility:	Clinton Power Station
Location:	Route 54 West Clinton, II 61727
Dates:	August 20 through August 24, 2003
Inspectors:	 T. Ploski, Senior Emergency Preparedness Inspector R. Schmitt, Emergency Preparedness Inspector B. Dickson, Senior Resident Inspector J. Strasma, Public Affairs Specialist
Observers:	J. Bond, Intern D. Merzke, Engineer D. Zemel, Illinois Emergency Management Agency
Approved by:	Kenneth Riemer, Chief Plant Support Branch Division of Reactor Safety

SUMMARY OF FINDINGS

IR 05000461/2003-006(DRS); AmerGen Energy Company, LLC; 08/20/03-08/24/03; Clinton Power Station; Emergency Preparedness Specialist Report.

The report covers a one-week baseline inspection by two regional emergency preparedness inspectors, a resident inspector, and a public affairs specialist. The inspection focused on the Emergency Preparedness Cornerstone in the Reactor Safety strategic performance area during the biennial emergency preparedness exercise. This inspection also included a review of records related to the three emergency preparedness performance indicators for the fifteen month period ending June 30, 2003. No findings of significance were identified.

The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

A. Inspector-Identified and Self-Revealed Findings

None.

B. <u>Licensee-Identified Violations</u>

None.

REPORT DETAILS

1. **REACTOR SAFETY**

Cornerstone: Emergency Preparedness

1EP1 Exercise Evaluation (71114.01)

a. Inspection Scope

The inspectors reviewed the August 20, 2003 biennial emergency preparedness exercise's objectives and scenario to ensure that the exercise would acceptably test major elements of the licensee's emergency plan and to verify that the exercise's simulated problems provided an acceptable framework to support demonstration of the licensee's capability to implement its plan. The inspectors also reviewed records of a drill, which was conducted in July 2003, to determine whether the associated accident scenario was sufficiently different from the scenario used in the August 20, 2003 exercise.

The inspectors evaluated the licensee's exercise performance, focusing on the risk-significant activities of emergency classification, notification, and protective action decision making, as well as implementation of accident mitigation strategies in the following emergency response facilities:

- Main Control Room Simulator (MCRS);
- Technical Support Center (TSC);
- Operations Support Center (OSC);
- Emergency Operations Facility (EOF); and
- Joint Public Information Center

The inspectors also assessed the licensee's recognition of abnormal plant conditions, transfer of responsibilities between facilities, internal communications, interfaces with offsite officials, readiness of emergency facilities and related equipment, and overall implementation of the licensee's emergency plan.

The inspectors attended post-exercise critiques in the MCRS, TSC, OSC, and EOF to evaluate the licensee's initial self-assessment of its exercise performance. The inspectors later met with the licensee's lead exercise evaluators to obtain the licensee's refined assessments of its exercise participants' performances. These self-assessments were then compared with the inspectors' independent observations and assessments to assess the licensee's ability to adequately critique station performance during the exercise.

b. <u>Findings</u>

No findings of significance were identified.

4. **OTHER ACTIVITIES**

4OA1 Performance Indicator (PI) Verification (71151)

a. Inspection Scope

The inspectors reviewed the licensee's records related to each of the three emergency preparedness PIs to verify that the licensee's program was implemented consistent with the industry guidelines in Nuclear Energy Institute publication No. 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 2, and related licensee procedures. Specifically, licensee records related to the performance of the Alert and Notification System (ANS), key Emergency Response Organization (ERO) members' drill participation, and Drill and Exercise Performance (DEP) were reviewed to verify the accuracy and completeness of the data submitted to NRC for the period from April 1, 2002 through June 30, 2003.

b. Findings

No findings of significance were identified.

- 40A6 Meetings
- a. Exit Meeting

The inspectors presented the inspection results to Mr. K. Polson and other members of licensee management and staff at the conclusion of the inspection on August 21, 2003. The licensee acknowledged the information presented. No proprietary information was identified.

b. Public and Media Briefing

On August 22, 2003, an inspector presented NRC's preliminary conclusions on the overall quality of the licensee's exercise and critique performances at the Federal Emergency Management Agency's public and media briefing held in Clinton, Illinois.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

<u>Licensee</u>

- J. Cunningham, Work Management Director
- J. DeYoung, Corporate Emergency Planner
- S. Erickson, Corporate Emergency Planner
- M. Friedman, Emergency Planning Manager
- R. Frantz, Regulatory Assurance Representative
- W. Iliff, Regulatory Assurance Manager
- S. McCain, Corporate Emergency Planning Manager
- S. Merrill, Byron Station Emergency Planning Coordinator
- K. Polson, Plant Manager
- P. Sunderland, Corporate Emergency Planner
- F. Tague, Quad Cities Station Emergency Planning Manager

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety but rather that selected sections of portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

1EP1 Exercise Evaluation

Clinton Station Annex to the Exelon Standardized Emergency Plan, Revision 2

EP-AA-110; Assessment of Emergencies; Revision 2

EP-AA-111; Emergency Classification and Protective Action Recommendations; Revision 3

EP-AA-112; Emergency Response Organization and Emergency Response Facility Activation and Operation; Revision 5

EP-AA-112-200; TSC Activation and Operation; Revision 2

EP-AA-112-300; OSC Activation and Operation; Revision 2

EP-AA-112-400; EOF Activation and Operation; Revision 2

EP-AA-113; Personnel Protective Actions; Revision 3

EP-AA-114; Notifications; Revision 2

Clinton Power Station 2003 Exercise Scenario Manual

Clinton 2003 Pre-exercise Findings and Observations Report; dated July 28, 2003

Internal Memo; Readiness Assessment of Emergency Preparedness Program Areas to be Evaluated by NRC During Week of the Graded Exercise - July 01-18, 2003

Draft Clinton Station 2003 Exercise Critique Report; dated August 21, 2003

40A1 Performance Indicator Verification

Monthly and Quarterly Records of Opportunities for the ANS, ERO, and DEP Performance Indicators; April 2002 Through June 2003

Clinton Off-Site Siren Test Plan; Revision 0

LIST OF ACRONYMS USED

- ANS Alert and Notification System
- DEP Drill and Exercise Performance
- EOF Emergency Operations Facility
- ERO Emergency Response Organization
- JPIC Joint Public Information Center
- MCRS Main Control Room Simulator
- NRC Nuclear Regulatory Commission

NUREG Nuclear Regulatory Guide

- OSC Operations Support Center
- PI Performance Indicator
- TSC Technical Support Center