December 24, 2002

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

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION UNITS 2 & 3 NRC-EVALUATED

EMERGENCY PREPAREDNESS EXERCISE INSPECTION REPORT

50-277/02-008, 50-278/02-008

Dear Mr. Skolds:

The enclosed report documents an inspection at the Peach Bottom Atomic Power Station, Units 2 & 3, which evaluated the performance of your emergency response organization during the November 19, 2002, full-participation exercise and the post-exercise critique as specified in the reactor oversight program. The inspectors discussed the findings of this inspection with Mr. R. G. West and other members of your staff on November 21, 2002.

This inspection was an examination of 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. Within these areas, the inspection consisted of a selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, no findings of significance were identified.

In accordance with 10 CFR 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 http://www.nrc.gov/reading-rm/ADAMS.html (the Public Electronic Reading Room).

Should you have any questions regarding this report, please contact Mr. Richard J. Conte at (610) 337-5183.

Sincerely,

/RA/

Richard J. Conte, Chief Operational Safety Branch Division of Reactor Safety

Docket Nos. 50-277; 50-278 License Nos.: DPR-44, DPR-56

Enclosures: Inspection Report No. 50-287/02-011, 50-288/02-011

Attachment 1: Supplemental Information

cc w/encl:

Senior Vice President, Mid-Atlantic Regional Operating Group

Chief, Operating Officer, Exelon Generation Company, LLC

Senior Vice President, Operations Support

Vice President, Mid-Atlantic Operations Support

Senior Vice President, Nuclear Services

Site Vice President, Peach Bottom Atomic Power Station

Plant Manager, Peach Bottom Atomic Power Station

Vice President - Licensing

Director, Licensing, Mid-Atlantic Regional Operating Group

Director, Nuclear Oversight

Regulatory Assurance Manager - Exelon Generation Company, LLC

Vice President and General Counsel

D. Quinlan, Manager, Financial Control, PSEG

R. McLean, Power Plant Siting, Nuclear Evaluations

D. Levin, Acting Secretary of Harford County Council

R. Ochs, Maryland Safe Energy Coalition

Mr. & Mrs. Dennis Hiebert, Peach Bottom Alliance

Mr. & Mrs. Kip Adams

D. Allard, Director, Pennsylvania Bureau of Radiation Protection

R. Janati, Chief, Division of Nuclear Safety, Pennsylvania Bureau of Radiation Protection

Correspondence Control Desk

Commonwealth of Pennsylvania

State of Maryland

TMI - Alert (TMIA)

Board of Supervisors, Peach Bottom Township

R. Fletcher, Department of Environment, Radiological Health Program

J. Johnsrud, National Energy Committee, Sierra Club

Public Service Commission of Maryland, Engineering Division

Manager, Licensing - Limerick and Peach Bottom

Manager, License Renewal

P. Cote, Acting Regional Director, FEMA Region III

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DATE	12/17/02	12/18/02	12/24/02	

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U. S. NUCLEAR REGULATORY COMMISSION

REGION I

Docket Nos: 50-277, 50-278

License Nos: DPR-44, DPR-56

Report Nos: 50-277/02-008, 50-278/02-008

Licensee: Exelon Generation Company, LLC

Correspondence Control Desk 200 Exelon Way, KSA 1-N-1 Kennett Square, PA 19348

Facilities: Peach Bottom Atomic Power Station Units 2 & 3

Location: 1848 Lay Road

Delta, Pennsylvania

Dates: November 19-21, 2002

Inspectors: N. McNamara, Sr. Emergency Preparedness Inspector

T. Fish, Sr. Operations Engineer

M. Buckley, Resident Inspector, Susquehanna

J. Noggle, Sr. Health Physicist

Approved by: Richard J. Conte, Chief

Operational Safety Branch Division of Reactor Safety

SUMMARY OF FINDINGS

IR 05000277/02-008, IR 05000278/02-008; on 11/19-21/2002; Peach Bottom Atomic Power Station; Units 2&3; Emergency Preparedness Exercise Report.

This team inspection was conducted by regional based inspectors and a resident inspector. 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 Oversite Process," Revision 3, dated July 2000.

A. Inspector Identified Findings

Cornerstone: Emergency Preparedness

No findings of significance were identified

B. Licensee Identified Findings

None

Report Details

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness (EP)

1EP1 Exercise Evaluation

A. <u>Inspection Scope</u>

An in-office review was conducted of Exelon's exercise objectives submitted to the NRC on August 20, 2002 and the exercise scenario submitted on September 29, 2002 to determine if the Peach Bottom exercise would test major elements of Exelon's Emergency Plan as required by 10 CFR 50.47(b)(14).

The onsite inspection consisted of the following review and assessment:

- The adequacy of Exelon's performance on the biennial full-participation exercise performance by primarily focusing on the implementation of the risk-significant planning standards (RSPS) in 10 CFR 50.47 (b) (4), (5), (9) & (10) which are emergency classification, offsite notification, radiological assessment, and protective action recommendations, respectively.
- The overall adequacy of Exelon's emergency response facilities and its implementation of NUREG-0696, "Functional Criteria for Emergency Response Facilities" and Emergency Plan commitments. The facilities assessed were the simulator, technical support center (TSC), the operations support center (OSC) and the emergency operations facility (EOF).
- Other performance areas besides the RSPS, such as, the emergency response organization's (ERO) recognition of abnormal plant conditions, command and control, intra- and inter-facility communications, prioritization of mitigation activities, utilization of repair and field monitoring teams, interface with offsite agencies, and the overall implementation of the Emergency Plan and its implementing procedures.
- Past performance issues from NRC inspection reports and Exelon drill reports to determine effectiveness of corrective actions as demonstrated during this exercise to ensure compliance with 10CFR50.47(b)(14).
- The post-exercise critique to evaluate the Exelon's self-assessment of its ERO performance during the exercise and to ensure compliance with 10CFR50 Appendix E.IV.F.2.g.

The inspectors reviewed various documentation which are listed in Attachment 1 to this report.

b. <u>Findings</u>

No findings of significance were identified in this area.

1EP4 Emergency Action Level and Emergency Plan Changes

a. Inspection Scope

The inspectors conducted an in-office review of Exelon submitted changes for the Emergency Plan-related documents received from March 2002 to September 2002 to determine if the changes decreased the effectiveness of the Plan. A thorough review was conducted of documents related to the RSPS whereas a cursory review was conducted for non-RSPS documents. In October, 2002 Exelon submitted to the NRC a Standardized Emergency Plan and an annex to the Plan specific to Peach Bottom. A review of these documents are ongoing and the NRC's assessment of the changes will be documented in a subsequent inspection report.

b. <u>Findings</u>

No findings of significance were identified in this area.

4. OTHER ACTIVITIES

4OA1 Performance Indicator (PI) Verification

a. <u>Inspection Scope</u>

The inspectors reviewed Exelon's procedure for developing the data for the EP Pls which are: (1) Drill and Exercise Performance (DEP), (2) ERO Drill Participation and (3) ANS Reliability. The inspectors also reviewed the Exelon's drill/exercise reports, training records and ANS testing data for 2002 to verify the accuracy of the reported data. The review was conducted in accordance with NRC Inspection Procedure 71151. The acceptance criteria are 10 CFR 50.9 and NEI 99-02, Revision 2, "Regulation Assessment Performance Indicator Guideline".

b. Findings

No findings of significance were identified in this area.

4OA2 Identification and Resolution of Problems

a. Inspection Scope

The inspectors reviewed Exelon's critique findings documented in 2001 and 2002 drill and exercise reports to determine if significant performance trends exist and to determine the effectiveness of licensee corrective actions based upon ERO performance during the exercise. The inspectors verified that issues identified during this exercise were entered into Exelon's corrective action program and reviewed

condition reports related to significant findings from past drill/exercise reports to assess the adequacy of the corrective actions.

b. Findings

No findings of significance were identified.

40A6 Meetings, including Exit

The inspectors presented the inspection results to Mr. R. G. West and other members of the Exelon's staff at the conclusion of the inspection on November 21, 2002.

ATTACHMENT 1

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Peach Bottom Atomic Power Station, Units 2 & 3

- G. Johnston, Plant Manager
- D. Tailleart, MAROG Emergency Preparedness Manager
- A. Coppa, PB EP Manager
- S. Mannix, MAROG Emergency Preparedness

NRC

- M. Shanbaky, Branch Chief, Region I
- S. Iyer, Reactor Engineer, Region I

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Discussed

None

LIST OF ACRONYMS

ANS	Alert and Notification System		
DEP	Drill and Exercise Performance		
EOF	Emergency Operations Facility		
EP	Emergency Preparedness		
ERO	Emergency Response Organization		
OSC	Operations Support Center		

OSC Operations Support Center Pl Performance Indicator

RSPS Risk Significant Planning Standard SDP Significant Determination Process

TSC Technical Support Center

LIST OF DOCUMENTS REVIEWED

Exelon Nuclear Standardized Radiological Emergency Plan

Exelon Radiological Emergency Plan Annex for Peach Bottom Atomic Power Station

Emergency Procedure No. EP-AA-111, Emergency Classification and PARs

Emergency Procedure No. EP-AA-112, ERO/ERF Activation and Operation

Emergency Procedure No. EP-AA-114, Notifications

Emergency Procedure No. EP-AA-113, Personnel Protective Actions

Emergency Procedure No. EP-AA-112-200, TSC Activation and Operation

Emergency Procedure No. EP-AA-112-100, Control Room Operations

Emergency Procedure No. EP-AA-112, ERO/Emergency Response Facility Activation

Emergency Procedure No. EP-MA-110-200, Dose Assessment

Emergency Procedure No. EP-AA-112-402, EOF Command and Control

Training Drill Findings and Observation Report, Dated January 2, 20002

PB October 18, 2002 Pre-Exercise Preliminary Evaluation Report, dated October 23, 2002

PB August 22, 2002 Standard Plan Drill Report, September 20, 202

PB August 29, 2002 DEP Drill Evaluation Report

PB August 16, 2002 DEP Drill Evaluation Report

Training Drill Findings and Observation Report, dated March 18, 2002

PB Emergency Preparedness Training Drill, dated July 26, 2001

PB Emergency Preparedness Training Drill, dated June 25, 2001

PB Emergency Preparedness Training Drill, dated April 26, 2001

PB Emergency Preparedness Training Drill, dated January 24, 2001