

April 15, 2009

Mr. Charles G. Pardee
Senior Vice President, Exelon Generation Company, LLC
President and Chief Nuclear Officer (CNO), Exelon Nuclear
4300 Winfield Road
Warrenville IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3
BASELINE EMERGENCY PREPAREDNESS BIENNIAL EXERCISE
INSPECTION REPORT 05000237/2009502; 05000249/2009502

Dear Mr. Pardee:

On March 27, 2009, the U.S. Nuclear Regulatory Commission (NRC) completed a Baseline Emergency Preparedness Biennial Exercise inspection at your Dresden Nuclear Power Station, Units 2 and 3. The enclosed report documents the inspection findings, which were discussed on March 27, 2009, with Mr. S. Marik 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.

Based on the results of this inspection, no NRC-identified and no self-revealed findings of significance were identified.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made 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), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Hironori Peterson, Chief
Operations Branch
Division of Reactor Safety

Docket Nos. 50-237; 50-249
License Nos. DPR-19; DPR-25

Enclosure: Inspection Report 05000237/2009502; 05000249/2009502
w/Attachment: Supplemental Information

See Attached Distribution

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Letter to Charles G. Pardee from Hironori Peterson dated April 15, 2009.

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BASELINE EMERGENCY PREPAREDNESS BIENNIAL EXERCISE
INSPECTION REPORT 05000237/2009502; 05000249/2009502

cc w/encl: Site Vice President - Dresden Nuclear Power Station
Plant Manager - Dresden Nuclear Power Station
Manager Regulatory Assurance – Dresden Nuclear Power Station
Senior Vice President - Midwest Operations
Senior Vice President - Operations Support
Vice President - Licensing and Regulatory Affairs
Director - Licensing and Regulatory Affairs
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J. Klinger, State Liaison Officer,
Illinois Emergency Management Agency
Chairman, Illinois Commerce Commission
Emergency Preparedness Manager - Dresden Nuclear Power Station

Letter to Charles G. Pardee from Hironori Peterson dated April 15, 2009.

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Vice President - Licensing and Regulatory Affairs
Director - Licensing and Regulatory Affairs
Manager Licensing - Clinton, Dresden, and Quad Cities
Associate General Counsel
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Assistant Attorney General
J. Klinger, State Liaison Officer,
Illinois Emergency Management Agency
Chairman, Illinois Commerce Commission
Emergency Preparedness Manager - Dresden Nuclear Power Station

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NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: 50-237; 50-249
License Nos: DPR-19; DPR-25

Report No: 05000237/2009502; 05000249/2009502

Licensee: Exelon Generation Company

Facility: Dresden Nuclear Power Station, Units 2 and 3

Location: Morris, Illinois

Dates: March 23 through 27, 2009

Inspectors: Robert Jickling, Senior Emergency Preparedness Inspector
Regina Russell, Emergency Preparedness Inspector
Daneira Meléndez-Colón, Resident Inspector

Approved by: Hironori Peterson, Chief
Operations Branch
Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

IR 05000237/2009502, 05000249/2009502; 03/23/2009 - 03/27/2009; Dresden Nuclear Power Station, Units 2 and 3; Baseline Emergency Preparedness Biennial Exercise Inspection.

This report covers a 1 week period of announced baseline inspection by two regional inspectors and one resident inspector. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply may be Green or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

A. NRC-Identified and Self-Revealed Findings

Cornerstone: Emergency Preparedness

No findings of significance were identified.

B. Licensee-Identified Violations

No violations of significance were identified.

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness

1EP1 Exercise Evaluation (71114.01)

.1 Exercise Evaluation

a. Inspection Scope

The inspectors reviewed the March 25, 2009, 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 other drills and exercises conducted in 2007, 2008, and 2009, to verify that those drills' scenarios were sufficiently different from the scenario used in the March 25, 2009, exercise.

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

- Control Room Simulator (CRS);
- Technical Support Center (TSC); and
- Emergency Operations Facility (EOF).

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 CRS, TSC, 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 and managers to obtain the licensee's findings and 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 its exercise performance. Documents reviewed are listed in the Attachment to this report.

This exercise evaluation inspection constituted one sample as defined in Inspection Procedure (IP) 71114.01-05.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES

4OA1 Performance Indicator (PI) Verification (71151)

.1 Drill/Exercise Performance

a. Inspection Scope

The inspectors sampled licensee submittals for the Drill/Exercise Performance PI for the period from the 4th quarter 2007 through the 4th quarter 2008. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance contained in the Nuclear Energy Institute (NEI) Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5, were used. The inspectors reviewed the licensee's records associated with the PI to verify that the licensee accurately reported the indicator in accordance with relevant procedures and the NEI guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the PI; assessments of PI opportunities during pre-designated control room simulator training sessions, performance during the 2008 off-year exercise, and performance during other drills. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one Drill/Exercise Performance sample as defined in IP 71151-05.

b. Findings

No findings of significance were identified.

.2 Emergency Response Organization Drill Participation

a. Inspection Scope

The inspectors sampled licensee submittals for the Emergency Response Organization (ERO) Drill Participation PI for the period from the 4th quarter 2007 through the 4th quarter 2008. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance contained in the NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5, were used. The inspectors reviewed the licensee's records associated with the PI to verify that the licensee accurately reported the indicator in accordance with relevant procedures and the NEI guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the PI; performance during the 2008 off-year exercise and other drills; and revisions of the roster of personnel assigned to key emergency response organization positions. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one ERO drill participation sample as defined in IP 71151-05.

b. Findings

No findings of significance were identified.

.3 Alert and Notification System

a. Inspection Scope

The inspectors sampled licensee submittals for the Alert and Notification System (ANS) performance indicator for the period from the 4th quarter 2007 through the 4th quarter 2008. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance contained in the NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 5, were used. The inspectors reviewed the licensee's records associated with the PI to verify that the licensee accurately reported the indicator in accordance with relevant procedures and the NEI guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the PI and results of periodic ANS operability tests. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one alert and notification system sample as defined in IP 71151-05.

b. Findings

No findings of significance were identified.

4OA5 Other Activities

.1 (Closed) NRC Temporary Instruction (TI) 2515/175 "Emergency Response Organization, Drill/Exercise Performance Indicator, Program Review"

The inspector performed TI 2515/175, ensured the completeness of the TI's Attachment 1 and then forwarded the data to NRC, Headquarters

4OA6 Management Meetings

.1 Exit Meeting Summary

On March 27, 2009, the inspectors presented the inspection results to Mr. S. Marik, and other members of the licensee staff. The licensee acknowledged the issues presented. The inspectors confirmed that none of the potential report input discussed was considered proprietary.

The inspectors confirmed that none of the potential report input discussed was considered proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

S. Merik, Plant Manger
K. Appel, Corporate Emergency Preparedness Manager
D. Leggett, Nuclear Oversight Manger
R. Luburn, Radiation Protection
T. Mohr, Engineering
P. Quealy, Emergency Preparedness Manager
S. Taylor, Regulatory Assurance Manager
S. Vercelli, Acting Work Management Director

Nuclear Regulatory Commission

D. Meléndez-Colón, Resident Inspector

LIST OF ITEMS OPENED, CLOSED AND DISCUSSED

Opened, Closed, and Discussed

None

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.

EMERGENCY PLAN AND PROCEDURES

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
EP-AA-1000	Exelon Nuclear Standardized Radiological Emergency Plan	19
EP-AA-1004	Exelon Nuclear Radiological Emergency Plan Annex for Dresden Station	25
EP-MW-110-200	Dose Assessment	7
EP-AA-111	Emergency Classification and Protective Action Recommendations	14
EP-AA-111-F-04	Dresden Plant Based PAR Flowchart	C
EP-AA-112-400	Emergency Operations Facility Activation and Operation	8
EP-AA-113	Personnel Protective Action	9

EXERCISE RECORDS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
	Dresden Station 2009 NRC Graded Exercise Scenario Manual	February 25, 2009
	Drill and Exercise Scenario Timelines	March 21, 2007 - March 27, 2009
	Corrective Action Program Items Identified during Drills and Exercises	June 28, 2006 - October 8, 2008
Self-Assessment Report 862747	NRC EP Exercise Inspection Readiness	February 17, 2009

CORRECTIVE ACTION PROGRAM DOCUMENTS REVIEWED

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
AR 00618849	2007 Exercise EOF Unable to Establish Correct Release Path	April 18, 2007
AR 00611051	2007 Exercise TSC Team Classification and Delays	March 30, 2007
AR 00611004	2007 Exercise Scenario Improvement Items	March 31, 2007
AR 00607981	2007 Exercise Management and Scenario Control Weakness	March 21, 2007
AR 00607546	2007 Exercise NOS OSC Critique Issues	March 21, 2007
AR 00607089	2007 Exercise Simulator Failure	March 21, 2007
AR 00607079	2007 Exercise NOS TSC Problem Observations	March 21, 2007

PERFORMANCE INDICATOR RECORDS AND DOCUMENTS

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
LS-AA-2110	Monthly Data Elements for NRC Emergency Response Organization Drill Participation Records	December 2007 - December 2008
LS-AA-2120	Monthly Data Elements for NRC Drill/Exercise Performance Records	October 2007 - December 2008
LS-AA-2130	Monthly Data Elements for NRC Alert and Notification System (ANS) Reliability Records	October 2007 - December 2008

CORRECTIVE ACTION PROGRAM REPORTS GENERATED DURING INSPECTION

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
AR 00905174	2009 Exercise EOF Dose Assessment Variations Identified by NRC	April 9, 2009
AR 00903654	2009 Exercise EOF Dose Assessment Communications and Information Issues	April 6, 2009

CORRECTIVE ACTION PROGRAM REPORTS GENERATED DURING INSPECTION

<u>Number</u>	<u>Description or Title</u>	<u>Date or Revision</u>
AR 00903566	2009 Exercise Training Needed on Control Room Communicator Roles	April 6, 2009
AR 00903559	2009 Exercise Information Not Relayed to Station Security from TSC	April 6, 2009
AR 00903514	2009 Exercise Scenario Radiation Data Provided Incorrect Units for Field Meters	April 4, 2009
AR 00903499	2009 Exercise Performance Item for TSC Habitability and Slow Updating on Team Status Board	April 4, 2009
AR 00900365	2009 Exercise Unsatisfactory Demonstration Criteria for Simulated Site Evacuation	March 31, 2009
AR 00900346	2009 Exercise Unsatisfactory Demonstration Criteria for CRS Habitability	March 31, 2009
AR 00898171	2009 Exercise Nuclear Oversight OSC Team Briefing Form Completion Observation	March 26, 2009
AR 00898136	2009 Exercise Nuclear Oversight Concern Regarding the Early Issuance of Potassium Iodide	March 26, 2009
AR 00897914	2009 Exercise Nuclear Oversight Concerns Regarding the Use of Acronyms and Early Dispatch of Field Teams	March 26, 2009

LIST OF ACRONYMS USED

ADAMS	Agencywide Documents Access and Management System
ANS	Alert and Notification System
CFR	Code of Federal Regulations
CRS	Control Room Simulator
EOF	Emergency Operations Facility
EP	Emergency Preparedness
ERO	Emergency Response Organization
IMC	Inspection Manual Chapter
IP	Inspection Procedure
KI	Potassium Iodide
NARS	Nuclear Accident Reporting System
NEI	Nuclear Energy Institute
NOS	Nuclear Oversight
NRC	Nuclear Regulatory Commission
OSC	Operations Support Center
PAR	Protective Action Recommendation
PARS	Publicly Available Records
PI	Performance Indicator
SDP	Significance Determination Process
TI	Temporary Instruction
TSC	Technical Support Center