



NUCLEAR ENERGY INSTITUTE

Adrian P Heymer
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September 15, 2004

Dr. William D. Beckner
New, Research and Test Reactor Program
Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Project 689

Dear Dr. Beckner,

We appreciate the constructive dialogue and progress made on emergency planning ITAAC (generic issue COL-10). As agreed at the close of our July 30, 2004, public meeting, the enclosure to this letter provides further input based on our discussions, including:

- Discussion and recommendation for EP ITAAC N.1 to permit interim operation up to 5 percent power if there are corrective actions necessary to resolve NRC- or FEMA-identified deficiencies following the full participation exercise. This would be consistent with 10 CFR 52.103(c) and 10 CFR 50.47 and Appendix E.
- Basis for our recommendation to eliminate the NRC staff proposed EP ITAAC X.1 on submittal of detailed emergency response procedures
- Recommended changes to several EP ITAAC in the staff's July 27, 2004, proposal, including D.1.b (on the emergency action level scheme, and H.2.c (on Emergency Operations Facility habitability)

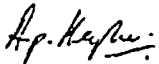
We look forward to continuing the dialogue based on these comments and recommendations to move us forward towards closure of generic issue COL-10. We understand and expect that the generic EP ITAAC thus established constitute the scope of EP ITAAC that will be required of COL applicants. We expect that a COL

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applicant would use these generic EP ITAAC, supplemented as indicated by plant-specific information to arrive at the set of plant-specific EP ITAAC to be included in a COL application. Once there is a common understanding on EP ITAAC, it will be included in our forthcoming COL application guideline, NEI 04-01.

If you have any questions regarding the comments and recommendations contained in this letter, please contact me (202-739-8094 or aph@nei.org) or Russ Bell (202-739-8087 or rjb@nei.org).

Sincerely,



Adrian Heymer

Enclosure

c: Joe Sebrosky, NRC/NRR

Enclosure to NEI letter dated September 15, 2004
Industry Recommendations Regarding NRC-Proposed EP ITAAC
Discussed in the Public Meeting on July 30, 2004

This enclosure contains:

1. Discussion of ITAAC treatment of deficiencies identified in the full participation exercise
2. Discussion of elimination of the proposed ITAAC on submittal of emergency planning procedures
3. Redline mark-up of the NRC staff's July 27, 2004, EP ITAAC proposals

1. ITAAC Treatment of Deficiencies Identified in the Full Participation Exercise

Appendix E.IV.F.2.a to 10 CFR Part 50 states that a full participation "exercise shall be conducted within two years before the issuance of the first operating license for full power (one authorizing operation above 5% of rated power)." The industry and the NRC staff have agreed in concept that, for a combined license (COL), the full participation exercise should be conducted prior to fuel load and that there should be ITAAC related to the exercise.

At a meeting on July 30, 2004, the NRC staff proposed an ITAAC acceptance criterion on the full participation exercise that states that "A FEMA report exists that concludes that there are no unresolved exercise deficiencies." As discussed on July 30, this language would require that all exercise deficiencies be resolved before fuel load – something that was not required of current licensees under Part 50. Current licensees were required to conduct the exercise and resolve any deficiencies prior to operation above 5 percent power. NEI took an action item to consider alternative ITAAC language that would provide for Part 50 and Part 52 licensees to be subject to similar requirements in this regard.

Discussion

Current Part 50 requirements on the full participation exercise stem from the generic determination by the Commission that it is acceptable to safety to defer the exercise (and therefore correction of deficiencies identified by the exercise) until the plant achieves 5% rated power. In a rulemaking in 1982 (47 Fed. Reg. 30232 (July 13, 1982)), the Commission changed the timing of the exercise. Prior to 1982, the exercise was required to be conducted prior to issuance of the operating license. The 1982 rule replaced this with a requirement that the exercise be conducted prior to exceeding 5% of rated power. In doing so, the Commission found that:

- the risks of low power testing are “greatly reduced” compared to the risks of full power operation;
- “the degree of emergency preparedness necessary to provide adequate protection of the public health and safety [during low power testing] is significantly less than that required for full-power operation;” and
- “the rule changes are technically justifiable and will enhance the efficiency of the licensing process, without adversely affecting the public health and safety.”

This generic 1982 determination and revised requirement on the timing of the full participation exercise are equally applicable to future plants licensed under Part 52.

Moreover, Part 52 expressly provides for fuel load and interim operation pending full resolution of ITAAC issues. Specifically, 10 CFR § 52.103(c) states that:

After receiving a request for a hearing, the Commission expeditiously shall either deny or grant the request. If the request is granted, the Commission shall determine, after considering petitioners prima facie showing and any answers thereto, whether during a period of interim operation, there will be reasonable assurance of adequate protection of the public health and safety. If the Commission determines that there is such reasonable assurance, it shall allow operation during an interim period under the combined license.

Therefore, Section 52.103(c) explicitly recognizes that an “interim” period of operation may be allowed, despite the fact that there are open questions regarding the satisfaction of certain ITAAC. As provided by Section 52.103(c), interim operation may be permitted if the NRC determines that there is “reasonable assurance of adequate protection of public health and safety.”

Any NRC- or FEMA-identified deficiencies concerning the full participation exercise would be treated as important compliance issues, and the licensee would establish specific corrective action plans to resolve the deficiencies. Consistent with the intent of Section 52.103(c) and 10 CFR 50.47 and Appendix E, we believe EP ITAAC N.1.a, b & f on the full participation exercise should be structured to allow the ITAAC to be completed based on NRC verification, in consultation with FEMA as appropriate, that specific corrective actions have been identified by the licensee. This would allow NRC- or FEMA-identified deficiencies to be resolved in parallel with fuel load and low power operation (below 5% rated power).

As also discussed on July 30, the FEMA report or NRC inspection report on the full participation exercise might also identify areas for improvement concerning implementation of emergency response plans. As distinct from deficiencies, areas for improvement will be addressed as they are for existing plants, via the corrective

action program. The identification of areas for improvement would be not material to ITAAC concerning NRC- or FEMA identified exercise deficiencies.

Recommendation

Consistent with 10 CFR 50.47 and Appendix E, and Section 52.103(c), Part 52 licensees should be permitted to complete actions to correct NRC- or FEMA-identified deficiencies regarding off-site emergency plans after fuel load but before operation above 5% power. Accordingly, we recommend the following alternative language for proposed EP ITAAC acceptance criteria N.1.a, b, & f:

- a) The exercise is completed, on-site exercise personnel are mobilized in sufficient numbers to fill emergency response positions, and the licensee satisfies on-site exercise objectives for identification, evaluation, categorization, communication, and response to the emergency situation [the COL applicant will identify specific acceptance criteria], OR, if deficiencies exist, the licensee has specified corrective actions to resolve the deficiencies prior to operation above 5% of rated power.
- b) The on-site emergency response personnel successfully perform their assigned responsibilities [the COL applicant will identify specific responsibilities and acceptance criteria], OR, if deficiencies exist, the licensee has specified corrective actions to resolve the deficiencies prior to operation above 5% of rated power.
- f) A FEMA report exists and there are no unresolved deficiencies, OR, if FEMA-identified deficiencies exist, the licensee has specified corrective actions to resolve the deficiencies prior to operation above 5% of rated power.

In the event that NRC- or FEMA-identified deficiencies exist, we expect that the NRC would issue a confirmatory order to complete the specified corrective actions prior to operation above 5% of rated power.

Under this approach, we envision that the adequacy of the specified corrective actions for any NRC- or FEMA-identified deficiency would be open to challenge in the ITAAC hearing in accordance with Section 52.103(a). However, provided that the Commission makes a Section 52.103(c) finding with respect to the adequacy of the corrective actions, the licensee would be permitted to operate the plant below 5 percent power for an interim period pending completion of the hearings. If required corrective actions are completed to the satisfaction of the NRC and FEMA, as appropriate, during the period of interim operation under Section 52.103(c), the plant may proceed to full power operation in accordance with the terms of its license.

2. ITAAC on Submittal of Emergency Planning (EP) Procedures

At a meeting on July 30, 2004, the NRC staff proposed an EP ITAAC X.1 that would require the licensee to submit its EP procedures 180 days prior to fuel load. The staff stated that such an ITAAC is needed because without it, a combined license (COL) applicant would be required to submit its EP procedures 180 days prior to issuance of the COL in accordance with 10 CFR Part 50, Appendix E.V.

The industry agrees with the NRC staff that EP procedures should be submitted to the NRC 180 days prior fuel load, not 180 days prior to issuance of the COL. However, proposed ITAAC X.1 is not needed to achieve that goal.

When the NRC promulgated the regulations in Part 52 governing COLs, it recognized that some requirements in Part 50 were linked with issuance of an operating license and that, for a Part 52 plant, those requirements should be linked with NRC approval for fuel load rather than issuance of the COL. As a result, the NRC issued 10 CFR 52.83, which states:

Unless otherwise specifically provided for in this subpart, all provisions of 10 CFR part 50 and its appendices applicable to holders of construction permits for nuclear power reactors also apply to holders of combined licenses issued under this subpart. Similarly, all provisions of 10 CFR part 50 and its appendices applicable to holders of operating licenses also apply to holders of combined licenses issued under this subpart, once the Commission has made the findings required under §52.99. . .

Thus, Section 52.83 recognizes that, during construction, a COL licensee is only subject to those requirements in Part 50 that apply to construction permit holders, and that a COL licensee is not subject to the operational requirements in Part 50 until fuel load.

The Appendix E requirement to submit EP procedures is an example of a Part 50 operating license requirement that, in accordance with 10 CFR 52.83, is unambiguously linked to fuel load for plants licensed under Part 52. It is clear from the regulations that a COL licensee would be required to submit its EP procedures at least 180 days prior to scheduled fuel load.¹

Nonetheless, it would be appropriate to establish guidance on the applicability of specific EP requirements for Part 52 licensees, and we intend to include such guidance in our forthcoming COL application guideline, NEI 04-01. This is consistent with the approach the NRC staff has taken to clarify the applicability of the EP requirement on conduct of the EP exercise. Part 50, Appendix E, Section IV.F.2.a, requires that a full participation exercise “be conducted within two years

¹ The applicability of specific Part 50 requirements to Part 52 licensees is a matter that is being further clarified as part of the pending Part 52 rulemaking.

before the issuance of the first operating license for full power (one authorizing operation above 5% of rated power)." In SECY-95-090, the staff concluded that because the exercise would be part of EP ITAAC, it would have to be conducted before fuel load (not before license issuance). In a workshop last April 27, the staff also stated that the proposed COL emergency plans for a new unit at an existing site could be tested in a biennial exercise. We agree with the staff conclusion and plan to include appropriate guidance on these points as well in NEI 04-01.

In summary, we agree with the NRC staff interpretations to date of Part 50 EP requirements as they would be applied to Part 52 licensees and find them consistent with the Commission's intent in Section 52.83. However, no ITAAC or other new NRC requirement is necessary to clarify the submittal timing for EP procedures or how other Part 50 EP requirements apply under Part 52. Guidance in this area will be included in NEI 04-01, and we will seek NRC review and endorsement of that guidance.

Enclosure Item 3 – Mark-up of July 27, 2004, NRC EP ITAAC proposals (Consistent with July 30 discussions as documented in the NRC meeting summary dated 9/2/04)

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
D. Emergency Classification System			
10 CFR 50.47(b)(4) – A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.	D.1 A standard emergency classification and emergency action level (EAL) scheme exists, and identifies facility system and effluent parameters constituting the bases for the classification scheme.	<u>D.1.b An inspection of the control room, technical support center (TSC), and emergency operations facility (EOF) will be performed to verify that they have displays for retrieving facility system and effluent parameters specified in the emergency classifications and EAL scheme.</u>	<u>D.1.b The specified parameters are retrievable in the control room, TSC, and EOF, and the ranges of the displays encompass the values specified in the emergency classification and EAL scheme. [The COL applicant will adopt analogous design certification criteria, if applicable, or otherwise identify specific capabilities/methods.]</u>
E. Notification Methods and Procedures			
10 CFR 50.47(b)(5) – Procedures have been established for notification, by the licensee, of State and local response organizations and for notification of emergency personnel by all organizations; the content of initial and follow-up messages to response	E.1 The means exists to notify responsible State and local organizations within 15 minutes after the licensee declares an emergency. E.2 The means exists to notify emergency response personnel.	E.1 A test will be performed of the capability. E.2 A test will be performed of the capability.	E.1 The responsible State and local agencies receive notification within 15 minutes after the licensee declares an emergency. E.2 Emergency response personnel receive the notification and mobilization

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Deleted: D.1.b The facility systems specified in the emergency classification and EAL scheme are installed (and the set points are within applicable instrument range), and the system and effluent parameters are retrievable in the control room, technical support center (TSC), and emergency operations facility (EOF). [The COL applicant will identify specific capabilities/methods.]

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Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established.	E.6 The means exists to notify and provide instructions to the populace within the plume exposure EPZ.	E.6 A test will be performed of the capability.	communication. [The COL applicant will provide a specific acceptance criterion.] <u>E.6 The means for notifying and providing instruction to the public are demonstrated to meet design objectives as stated in the Emergency Plan.</u> [The COL applicant will identify specific capabilities/ methods.]
F. Emergency Communications			
10 CFR 50.47(b)(6) – Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.	F.1.d The means exists for communications among the control room, TSC, EOF, principal State and local emergency operations centers (EOCs), and radiological field assessment teams. F.1.f The means exists for communications from the control room, TSC, and EOF to the NRC headquarters and regional office EOCs (including establishment of the Emergency Response Data System (ERDS) between the	F.1 A test will be performed of the <u>communications</u> capability.	F.1.d Communications are established among the control room, TSC, EOF, principal State and local EOCs, and radiological field assessment teams. F.1.f Communications are established from the control room, TSC and EOF to the NRC headquarters and regional office EOCs, and an access port for ERDS is provided.

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Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
	onsite computer system and the NRC Operations Center).		
G. Public Education and Information			
10 CFR 50.47(b)(7) – Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.	G.3.b The licensee has provided space which may be used for a limited number of the news media at the nearside EOF.	G.3.b An inspection of the as-built facility/area provided for the news media will be performed.	G.3.b The licensee has provided space, which may be used for a limited number of the news media. [The COL applicant will specify the number of news media to be accommodated.]
II. Emergency Facilities and Equipment			
10 CFR 50.47(b)(8) – Adequate emergency facilities and equipment to support the emergency response are provided and maintained.	H.1 The licensee has established a technical support center (TSC) and onsite operations support center (OSC).	H.1 An inspection of the as-built TSC and OSC will be performed, including a test of the capabilities.	H.1.a The TSC has at least 174 square meters (1,875 square feet) of floor space. H.1.b The TSC is as close as possible to the control room,

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
			<p>and the walking distance from the TSC to the control room does not exceed two minutes. [The COL applicant will <u>adopt the design certification criterion, if applicable, or otherwise</u> specify the location of the TSC.]</p> <p>H.1.c The TSC has <u>comparable</u> habitability <u>with</u> the control room under accident conditions. [The COL applicant will <u>adopt the design certification criterion, if applicable, or otherwise</u> identify specific capabilities/ methods.]</p> <p>H.1.d TSC communications equipment is installed, and voice transmission and reception are accomplished. [The COL applicant will <u>adopt the design certification criterion, if applicable, or otherwise</u> identify specific capabilities.]</p> <p>H.1.e The TSC has the means to receive, store, process, and</p>

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
			<p>display plant and environmental information, and to initiate emergency measures and conduct emergency assessment. [The COL applicant will <u>adopt the design certification criterion, if applicable, or otherwise</u> identify specific physical means and procedures.]</p> <p>H.1.f The OSC is located onsite, separate from the control room and TSC, where plant logistic support can be coordinated during an emergency. [The COL applicant will <u>adopt the design certification criterion, if applicable, or otherwise</u> specify the location of the OSC, and identify specific support characteristics.]</p> <p>H.1.g OSC communications equipment is installed, and voice transmission and reception are accomplished. [The COL applicant will <u>adopt the design certification criterion, if applicable, or</u></p>

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
	H.2 The licensee has established an emergency operations facility (EOF), in accordance with NUREG-0696.	H.2 An inspection of the as-built EOF will be performed, including a test of the capabilities.	<p><u>otherwise identify specific capabilities/ methods.]</u></p> <p>H.2.a The EOF working space is sized for at least 35 persons, and is large enough for required systems, equipment, records and storage. [The COL applicant will identify specific size characteristics.]</p> <p>H.2.b The EOF is located to provide optimum functional and availability characteristics, and is coordinated with State and local authorities. [The COL applicant will specify the location of the EOF, and identify specific support characteristics.]</p> <p>H.2.c The EOF habitability is consistent with Table 2 of NUREG-0696. <u>[The COL applicant will specify the acceptance criteria for EOF habitability.]</u></p>

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
			<p>H.2.d EOF communications equipment is installed, and voice transmission and reception are accomplished with the control room, TSC, NRC, and State and local agencies. [The COL applicant will identify specific capabilities/ methods.]</p> <p>H.2.e The EOF has the means to acquire, display and evaluate all radiological, meteorological, and plant system data pertinent to determining offsite protective measures. [The COL applicant will identify specific capabilities/ methods.]</p> <p><i>ITAAC H.3.a and H.3.b are not necessary because they are covered by ITAAC N.1.f and H.2.d.</i></p>

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
I. Accident Assessment			
10 CFR 50.47(b)(9) – Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.	<p>I.2 The means exists to provide initial and continuing radiological assessment throughout the course of an accident.</p> <p>I.3 The means exists to determine the source term of releases of radioactive material within plant systems, and the magnitude of the release of radioactive materials based on plant system parameters and effluent monitors.</p> <p>I.4 The means exists to continuously assess the</p>	<p>I.2 A test will be performed of the capability.</p> <p>I.3 A test will be performed of the capability.</p> <p>I.4 A test will be performed of the</p>	<p>I.2 The means exists to provide initial and continuing radiological assessment throughout the course of an accident. [The COL applicant will identify specific capabilities/ methods.]</p> <p>I.3 The means exists to determine the source term of releases of radioactive material within plant systems, and the magnitude of the release of radioactive materials based on plant system parameters and effluent monitors. [The COL applicant will identify specific capabilities/methods.]</p> <p>I.4 The means exists to continuously assess the</p>

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H.3.a Verification will be made that State and local EOCs have been establishment. ¶
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H.3.b A test will be performed of the capability.

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
	<p>impact of the release of radioactive materials to the environment, accounting for the relationship between effluent monitor readings, and onsite and offsite exposures and contamination for various meteorological conditions.</p> <p>I.5 The means exists to acquire and evaluate meteorological information.</p> <p>I.8 The means exists to make rapid assessments of actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways, including activation, notification means, field team composition, transportation, communication, monitoring equipment, and estimated deployment times.</p>	<p>capability.</p> <p>I.5 A test will be performed of the capability.</p> <p>I.8 A test will be performed of the capability.</p>	<p>impact of the release of radioactive materials to the environment, accounting for the relationship between effluent monitor readings, and onsite and offsite exposures and contamination for various meteorological conditions. [The COL applicant will identify specific capabilities/ methods.]</p> <p>I.5 Meteorological data is available at the EOF, TSC, control room, offsite NRC center, and to the State. [The COL applicant will identify specific capabilities/ methods.]</p> <p>I.8 The means exists to make rapid assessment of actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways. [The COL applicant will identify specific capabilities/methods.]</p>

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
	<p>I.9 The capability exists to detect and measure radioiodine concentrations in air in the plume exposure EPZ, as low as 10^{-7} $\mu\text{Ci/cc}$ (microcuries per cubic centimeter) under field conditions.</p> <p>I.10 The means exists to estimate integrated dose from the projected and actual dose rates, and for comparing these estimates with the EPA protective action guides (PAGs).</p>	<p>I.9 A test will be performed of the capability.</p> <p>I.10 A test will be performed of the capability.</p>	<p>I.9 Radioiodine can be detected in the plume exposure EPZ, as low as 10^{-7} $\mu\text{Ci/cc}$. [The COL applicant will identify specific capabilities/ methods.]</p> <p>I.10 The means exists to estimate integrated dose from the projected and actual dose rates, and for comparing these estimates with the EPA protective action guides (PAGs). [The COL applicant will identify specific capabilities/ methods.]</p>
J. Protective Response			
10 CFR 50.47(b)(10) – A range of protective actions has been developed for the plume exposure EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of	<p>J.1 The means exists to warn and advise onsite individuals of an emergency, including those in areas controlled by the operator, including:</p> <ul style="list-style-type: none"> a. employees not having emergency assignments; b. visitors; c. contractor and 	J.1 A test will be performed of the capability.	J.1 The means exists to warn and advise onsite individuals. [The COL applicant will identify specific capabilities/methods.]

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
potassium iodide (KI), as appropriate. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure EPZ appropriate to the locale have been developed.	construction personnel; and d. other persons who may be in the public access areas, on or passing through the site, or within the owner controlled area.		<i>ITAAC J.10 is not necessary because it is covered by E.6.</i>
N. Exercises and Drills			
10 CFR 50.47(b)(14) – Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.	N.1 Licensee conducts a full-participation exercise to evaluate major portions of emergency response capabilities, which includes participation by each State and local agency within the plume exposure EPZ, and each State within the ingestion control EPZ.	N.1.a A full-participation exercise will be conducted, <u>to test mobilization of on-site emergency response personnel and identification, evaluation, categorization, communication, and response to an emergency situation.</u>	N.1.a The exercise is completed, <u>on-site exercise personnel are mobilized in sufficient numbers to fill emergency response positions, and the licensee satisfies on-site exercise objectives for identification, evaluation, categorization, communication, and response to the emergency situation [the COL applicant will identify specific acceptance criteria], OR, if deficiencies exist, the licensee has specified corrective actions to resolve the deficiencies prior</u>

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J.10 The means exists to notify all segments of the transient and resident population, and implement protective measures for the plume exposure EPZ. [The COL applicant will identify specific capabilities/ methods.]¶

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J.10 A test will be performed of the capability.

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
		<p>N.1.b A test will be performed of emergency response personnel capabilities.</p> <p>N.1.f A test will be performed of the offsite emergency plans and preparedness capabilities.</p>	<p><u>to operation above 5% of rated power.</u></p> <p>N.1.b The <u>on-site</u> emergency response personnel successfully perform their assigned responsibilities <u>[the COL applicant will identify specific responsibilities and acceptance criteria], OR, if deficiencies exist, the licensee has specified corrective actions to resolve the deficiencies prior to operation above 5% of rated power.</u></p> <p>N.1.f A FEMA report exists <u>and there are no unresolved deficiencies, OR, if FEMA-identified deficiencies exist, the licensee has specified corrective actions to resolve the deficiencies prior to</u></p>

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Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
			<u>operation above 5% of rated power.</u>
X. Implementing Procedures			<i>ITAAC X.1 is not necessary as separately discussed in Item 2 of this enclosure.</i>

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Deleted: X.1 The licensee has submitted detailed implementing procedures for its emergency plan no less than 180 days prior to fuel load. [The COL applicant will develop the specific implementing procedures.]