FPL.

L-2011-356
10 CFR 52.3

August 29, 2011

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Re: Florida Power & Light Company
Proposed Turkey Point Units 6 and 7
Docket Nos. 52-040 and 52-041
Response to NRC Request for Additional Information
Letter No. 033 (eRAI 5682) Standard Review Plan Section 14.03.10
Emergency Planning - Inspections, Tests, Analyses, and Acceptance Criteria

Reference:

1. NRC Letter to FPL dated August 1, 2011, Request for Additional Information Letter No.033 Related to SRP Section 14.03.10 – Emergency Planning – Inspections, Tests, Analyses, and Acceptance Criteria for the Turkey Point Nuclear Plant Units 6 and 7 Combined License Application

Florida Power & Light Company (FPL) provides, as an attachment to this letter, its response to the Nuclear Regulatory Commission's (NRC) request for additional information (RAI) 14.03.10 -1 provided in the referenced letter. The attachment identifies changes that will be made in a future revision of the Turkey Point Units 6 and 7 Combined License Application (if applicable).

If you have any questions, or need additional information, please contact me at 561-691-7490.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 29, 2011

Sincerely,

William Maher
Senior Licensing Director – New Nuclear Projects

WDM/GRM

Attachment: FPL Response to NRC RAI No. 14.03.10-1 (eRAI 5682)

cc:
PTN 6 & 7 Project Manager, AP1000 Projects Branch 1, USNRC DNRL/NRO
Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant 3 & 4

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D097
NRO

NRC RAI Letter No. PTN-RAI-LTR-033

SRP Section: 14.03.10 - Emergency Planning - ITAAC

Question from Licensing and Inspection Branch

NRC RAI Number: 14.03.10-1 (eRAI 5682)

Part 10, Tier 1/ITAAC - COL application Part 10, "License Conditions and ITAAC" (Revision 2, December 21, 2010), includes emergency planning (EP) ITAAC in Table 3.8-1, "Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria." Please address the following comments by making the identified revisions (including any other conforming or necessary changes), or explain why the revisions are not appropriate:

a. Since the EP ITAAC table will be duplicated and attached to the combined license (COL) for both Unit 6 and Unit 7, control room references should be to a single control room, rather than control rooms or each control room. Revise ITAAC Table 3.8-1 to reflect a single control room (e.g., change "control rooms" to "control room", or "each control room" to "the control room"). This includes ITAAC 1.1.1, 2.1, 3.1, 3.2, 5.1.3, 5.1.7, 5.1.8, 5.2.2, 6.1, and 6.4. Make any other necessary conforming changes. In addition, make the following minor ITAAC language changes: (1) In ITAAC 8.1.1.D.3, identify the first acceptance criterion with "a." before "Emergency response communications listed in EPIPs are available and operational." and renumber a., b., and c. as b., c., and d. (2) In ITAAC 8.1.3, revise the acceptance criterion to change "condition requiring offsite" to "condition requires offsite". (3) In ITAAC 8.1.1.E.2.a, add a closing parenthesis after the last word (i.e., "ERO personnel.)"). (4) Delete the duplicate ITAAC 8.1.1.E.2.b.

b. In ITAAC 5.1 inspections, tests, analyses, delete the second sentence, which reads: "These facilities will meet the criteria of NUREG-0696 with exceptions."

c. In ITAAC 5.1.1, the acceptance criterion states that the TSC size is consistent with NUREG-0696, and does not specify the actual size; which would be determined by the specific number of staff (at 75 square feet/person). Since there will be a common TSC for Units 3, 4, 6 and 7, the TSC size is likely to be greater than the 1875 square feet of floor space indicated in AP1000 DCD Tier 1 Table 3.1-1. Revise acceptance criterion 5.1.1 to specify the common TSC size, consistent with the proposed facility staffing (see, for example, ITAAC acceptance criterion 5.2.1).

d. In ITAAC 5.1.5, the acceptance criterion does not identify what plant and environmental information is available in the TSC (e.g., where it is listed in the COL application or AP1000 DCD). Revise the acceptance criterion to clearly identify the source/listing of the available information/parameters (see also, comment to ITAAC 5.2.3, below). In addition, delete the last sentence in the acceptance criterion, which reads: "These capabilities have been demonstrated during testing and acceptance activities." This sentence seems more appropriate for the inspections, tests, analyses column, and appears to be covered by the existing (first) sentence under 5.1, which reads: "An inspection of the TSC and OSC will be performed, including a test of their capabilities.

e. Add a new ITAAC acceptance criterion 5.1.9, which states: "Controls and displays exist in the TSC to control and monitor the status of the TSC ventilation system including heating and cooling, and the activation of the high-efficiency particulate air (HEPA) and charcoal filter system upon detection of high radiation in the TSC." (See Vogtle COLA Unit 3 EP ITAAC 5.1.8, which addresses habitabilty for a separate TSC.) As an alternative to adding a new acceptance criterion 5.1.9, other acceptance criteria in Table 3.8-1 (e.g., 5.1.4) may be revised to include language similar to 5.1.9, above.

f. The COL application references the AP1000 standard design, which includes ITAAC associated with emergency response facilities in DCD Tier 1 Table 3.1-1, "Inspections, Tests, Analyses, and Acceptance Criteria." The ITAAC in this table associated with the TSC and Operations Support Center (OSC) are replaced by ITAAC in COL application Part 10 Table 3.8-1. To the extent that the Table 3.8-1 ITAAC represent a replacement of the comparable Table 3.1-1 ITAAC, submit an appropriate exemption request that addresses this Tier 1 departure, pursuant to Section VIII.A.4 of Appendix D to 10 CFR Part 52.

g. In ITAAC 5.2.1, delete the two bullets in the acceptance criterion. Since the existing emergency operations facility (EOF) supporting Units 3 and 4 will be used for Units 6 and 7, the location and adequacy of the EOF building is outside of the scope of the staff's review of the COL application, pursuant to Section 13.3, "Emergency Planning" (Subsection I, "Areas of Review"), of NUREG-0800.

h. In ITAAC 5.2.3, revise the acceptance criterion to clearly identify the source/listing of the plant system data (or other plant parameteres) that will be displayed in the EOF (see also, comment to ITAAC 5.1.5, above).

i. ITAAC 8.1.1.C.1.a (regarding TSC command and control demonstration), and 8.1.1.D.1 and 8.1.1.D.1.a (regarding OSC, TSC, and EOF activation), indicate demonstration of the acceptance criterion "within 90 minutes" of the event classification. Explain the basis for the 90-minute criteria, and whether it is related to the 90-minute augmentation time in COLA Part 5 Table B-1b, "Staffing Requirements for the Turkey Point Plant Emergency Response Organization." If the 90-minute acceptance criteria are related to, or dependent upon Table B-1b, revise the time to be consistent with any changes to Table B-1b that result from your responses to NRC RAI 5681 (e.g., RAI B-6 through B-13), if appropriate.

j. Add a new ITAAC acceptance criterion 8.1.1.D.2.d, which states: "Demonstrate the capability of TSC and EOF equipment and data displays to clearly identify and reflect the affected unit." (See Vogtle COLA Unit 3 EP ITAAC 8.1.1.D.2.d, which addresses human factors engineering.)

FPL RESPONSE:

The staff's comments and identified changes to the Emergency Planning ITAAC Table 3.8-1 have been addressed in the following subparts:

a. EP ITAAC Table 3.8-1 will be updated in a future COLA revision to reflect a single control room for each unit of Turkey Point Units 6 & 7, resulting in changes to ITAAC 1.1.1, 2.1, 3.1, 3.2, 5.1.3, 5.1.7, 5.1.8, 5.2.2, 6.1 and 6.4 of ITAAC Table 3.8-1. Editorial

changes will also be made to ITAAC Table 3.8-1 in a future COLA revision, as described below:

1. An "a." will be added before "Emergency response communications listed in EPIPs are available and operational." and the subsequent numbering will be updated in ITAAC 8.1.1.D.3 Acceptance Criteria.
2. The phrase "condition requiring offsite" will be changed to "condition requires offsite" in ITAAC 8.1.3 Acceptance Criteria.
3. A closing parenthesis will be added to the last word in ITAAC 8.1.1.E.2.a Acceptance Criteria.
4. The duplicate ITAAC 8.1.1.E.2.b Acceptance Criteria will be deleted.

b. The second sentence in ITAAC 5.1 Inspections, Tests, Analyses of ITAAC Table 3.8-1 does not define inspections, tests, or analysis and therefore does not belong in the "Inspection, Tests, Anaylses" column of ITAAC Table 3.8-1. The second sentence in ITAAC 5.1 Inspections, Tests, Analyses of ITAAC Table 3.8-1 will be deleted in a future COLA revision.

c. The size of the TSC is based on a facility staffing of 40 people. 75 square feet per person is used to determine the floor space, which results in a TSC floor space of 3000 square feet. ITAAC 5.1.1 Acceptance Criteria of ITAAC Table 3.8-1 will be updated in a future COLA revision to specify a minimum size of 3000 square feet for the TSC.

d. The TSC has the means to monitor parameters specified in DCD Tier 1 ITAAC Table 3.1-1, Item 3. The plant and environmental information/parameters listed in DCD Table 7.5-1 and FSAR Table 7.5-201 will be available in the TSC. ITAAC 5.1.5 Acceptance Criteria will be updated in a future COLA revision to provide a reference to DCD Table 7.5-1 and FSAR Table 7.5-201, which identify the plant and environmental information/parameters available in the TSC. Additionally, an editorial change will be made to delete the last sentence of ITAAC 5.1.5 Acceptance Criteria of Table 3.8-1.

e. The TSC will contain controls and displays that will allow the facility's staff to control and monitor the status of the TSC ventilation system including heating and cooling, and the activation of the HEPA and charcoal filter system upon detection of high radiation in the TSC. ITAAC 5.1.4 Acceptance Criteria of Table 3.8-1 will be updated in a future COLA to add "Controls and displays exist in the TSC to control and monitor the status of the TSC ventilation system including heating and cooling, and the activation of the high-efficiency particulate air (HEPA) and charcoal filter system upon detection of high radiation in the TSC." By adding this statement to ITAAC 5.1.4, the addition of a new ITAAC 5.1.9 Acceptance Criteria will no longer be needed.

f. The emergency planning ITAAC that are in the scope of the Westinghouse AP1000 standard design are included in the DCD Tier 1, Table 3.1-1. These emergency planning ITAAC are incorporated by reference as stated in COLA Part 10, Appendix B. COLA Part 10, Table 3.8-1 provides site-specific emergency planning ITAAC that supplement or are outside the scope of the Westinghouse AP1000 standard design in DCD Tier 1, Table 3.1-1. Therefore, a Tier 1 departure and exemption request is not appropriate because the emergency planning ITAAC provided in COLA Part 10, Table

3.8-1 are not a replacement, but rather a supplement of the Westinghouse AP1000 standard design emergency planning ITAAC provided in DCD Tier 1, Table 3.1-1.

A cross-reference between the emergency planning ITAAC provided in DCD Tier 1, Table 3.1-1 and the supplemental site-specific emergency planning ITAAC provided in COLA Part 10, Table 3.8-1 is included in below table.

AP1000 Standard Design Emergency Planning ITAAC (DCD, Tier 1, Table 3.1-1)	Supplemental Site-specific Turkey Point Units 6 & 7 Emergency Planning ITAAC (COLA, Part 10, Table 3.8-1)
Item 1	5.1.1
Item 2	5.1.3
Item 3	5.1.5
Item 4	5.1.8
Item 5	5.1.2 and 5.1.7
Item 6	5.1.4

g. The existing Emergency Operations Facility (EOF) supporting Turkey Points Units 3 & 4 will be used for Turkey Point Units 6 & 7. Therefore, the location and adequacy of the building is outside the scope of the information to be provided in ITAAC Table 3.8-1. ITAAC 5.2.1 Acceptance Criteria will be updated in a future COLA revision to delete the two bullets.

h. The EOF has the means to monitor parameters specified in DCD Tier 1 ITAAC Table 3.1-1, Item 3. Radiological data as identified in the EP Unit Annex, meteorological data, and plant system data pertinent to determining offsite protective measures as listed in DCD Table 7.5-1 and FSAR Table 7.5-201 are available and displayed in the EOF, when activated. ITAAC 5.2.3 Acceptance Criteria will be updated in a future COLA revision to provide a reference to DCD Table 7.5-1 and FSAR Table 7.5-201, which identify the source/listing of the plant system data (or other plant parameters) that will be displayed in the EOF.

i. The 90 minute acceptance criterion indicated in ITAAC 8.1.1.C.1.a, 8.1.1.D.1 and 8.1.1.D.1.a is related to the 90 minute augmentation time in COLA Part 5, Table B-1b. This basis for this acceptance criterion and thus the response to this RAI question subpart as well as discussion regarding the OSC, TSC and EOF activation time will be provided in response to NRC RAI 13.03-5 (e-RAI 5681). Refer to NRC RAI 13.03-5 (e-RAI 5681) for the response to this RAI question subpart.

j. A new ITAAC 8.1.1.D.2.d will be added to ITAAC Table 3.8-1 in a future COLA revision to address human factors engineering of the TSC and EOF equipment and data displays. ITAAC 8.1.1.D.2.d will state: "Demonstrate the capability of TSC and EOF equipment and data displays to clearly identify and reflect the affected unit."

This response is PLANT SPECIFIC.

References:

Letter from Manny Comar (NRC) to Mano K. Nazar (FP&L), Request for Additional Information Letter No. 035 Related to SRP Section 13.03, Emergency Planning for the Turkey Point Nuclear Plant Units 6 and 7 Combined License Application (e-RAI 5681), dated August 15, 2011

ASSOCIATED COLA REVISIONS:

COLA, Part 10, Appendix B, Subsection "EMERGENCY PLANNING ITAAC" will be updated in a future COLA revision, as shown below:

The emergency planning ITAAC **that are in the scope of the Westinghouse AP1000 standard design are included in the referenced DCD Tier 1 Subsection 3.1 as incorporated by reference above. Site-specific emergency planning ITAAC that supplement or are outside the scope of the Westinghouse AP1000 standard design in DCD Tier 1 Subsection 3.1** are ~~included~~ **provided** in the attached Table 3.8-1. Include these ITAAC after DCD Tier 1 Section 3.7.

The following sheets of COLA Part 10, ITAAC Table 3.8-1 will be updated in a future COLA revision:

Table 3.8-1 (Sheet 1 of 18)
Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
1.0 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.	1.1 A standard emergency classification and emergency action level scheme exists, and identifies facility system and effluent parameters constituting the bases for the classification scheme. [D.1**] [**D.1 corresponds to NUREG-0654/ FEMA-REP-1 evaluation criteria.]	1.1.1 An inspection of ~~each~~ **the** control room, ~~the~~ 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 as specified in the Emergency Classification and EAL technical basis document ~~from each~~ **for the** unit, and the displays are functional.	1.1.1 The specified parameters are retrievable in ~~each~~ **the** control room, ~~the~~ TSC and EOF, and the ranges of the displays encompass the values specified in the Emergency Classification and EAL technical basis document ~~from each~~ **for the** unit.
		1.1.2 An analysis of the EAL technical bases will be performed to verify as-built, site-specific implementation of the EAL scheme.	1.1.2 The ranges available in the control room, TSC, and EOF envelop the values for the specific parameters identified in the EALs in Emergency Plan, Annex 2 & 3, Attachment 1.
2.0 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 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.	2.1 The means exists to notify responsible state and local organizations within 15 minutes after the licensee declares an emergency. [E.1]	2.1. A test will be performed to demonstrate the capabilities for providing initial notification to the offsite authorities after a simulated emergency classification.	2.1 The state of Florida and the counties of Miami-Dade, and Monroe received notification within 15 minutes after the declaration of an emergency in ~~each~~ **the** control room and the EOF.

Table 3.8-1 (Sheet 2 of 18)
Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
2.0 Notification Methods and Procedures (cont.)			
	2.2 The means exists to notify emergency response personnel. [E.2]	2.2 A test of the primary and backup emergency response organization (ERO) notification systems will be performed.	2.2 A test of the primary and back-up ERO notification systems results in: ERO personnel received the notification message; Mobilization communication was validated by personnel response to the notification system or by telephone; Response to electronic notification and plant page system was demonstrated during normal working hours, and off hours.
	2.3 The means exists to notify and provide instructions to the populace within the plume exposure emergency planning zone (EPZ). [E.6]	2.3 A full test of the alert and notification system and emergency alert system capabilities will be conducted.	2.3 Notification and clear instructions to the public are accomplished in accordance with the emergency plan requirements.
3.0 Emergency Communications			
10 CFR 50.47(b)(6) — Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.	3.1 The means exists for communications between the control rooms, TSC, EOF, principal state and local emergency operations centers (EOCs), and field monitoring teams. [F.1.d]	3.1 A test will be performed of the capabilities. The test for the contact with the principal EOCs and the field monitoring teams will be from ~~each~~ **the** control room and the EOF. The TSC communication with ~~each~~ **the** control room and the EOF will be performed.	3.1 Communications (both primary and secondary methods/systems) are established among the control rooms and the EOF with the state of Florida Division of Emergency Management warning point and EOC, Miami-Dade County warning point and EOC, and Monroe County warning point and EOC. Communications are established between the control rooms and the EOF with the PTN field monitoring teams.

Table 3.8-1 (Sheet 3 of 18)
Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
3.0 Emergency Communications (cont.)			
	3.2 The means exists for communications from the control rooms, TSC and EOF to the NRC headquarters and regional office EOCs (including establishment of the emergency response data system or its successor system between the onsite computer system and the NRC operations center.) [F.1.f]	3.2 A test is performed of the capabilities to communicate using the emergency notification system from ~~each operating~~ **the** control room, TSC and EOF to the NRC headquarters and regional office EOCs. The health physics network is tested to ensure communications between the TSC and EOF with the NRC operations center. The emergency response data system is established, or its successor system, between the onsite computer systems and the NRC operations center.	3.2 Communications are established from ~~each~~ **the** control room, TSC and EOF to the NRC headquarters and regional office EOCs using the emergency notification system. The TSC and EOF demonstrated communications with the NRC operations center using the health physics network. The access port for emergency response data system, or its successor system, is provided and successfully completes a transfer of data from ~~each operating~~ **the** unit to the NRC operations center.
4.0 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.	4.1 The licensee has provided space that may be used for a limited number of the news media. [G.3.b]	4.1 An inspection of the facility/area provided for the news media will be performed in the emergency news center. The space provides adequate equipment to support the emergency news center operation, including communications with the site and with the EOCs in the state and counties as well as a limited number of news media.	4.1 The emergency news center includes equipment to support the emergency news center operations, including communications with the EOF and state and county EOCs. Designated space is available for news media briefings.
5.0 Emergency Facilities and Equipment			
10 CFR 50.47(b)(8) — Adequate emergency facilities and equipment to support the emergency response are provided and maintained.	5.1 The licensee has established a TSC and onsite operations support center (OSC).	5.1 An inspection of the TSC and OSC will be performed, including a test of their capabilities. ~~These facilities will meet the criteria of NUREG-0696 with exceptions.~~	5.1.1 The TSC ~~size is~~ **has at least 3000 square feet of floor space** consistent with NUREG-0696 **(75 square feet/person)** and is large enough for required systems, equipment, records, and storage.

Table 3.8-1 (Sheet 4 of 18)
Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
			5.1.2 The TSC is located outside the Protected Area, and procedures are in place to enhance passage through security checkpoints expeditiously.
			5.1.3 Communications equipment is installed and voice transmission and reception are accomplished between ~~each~~ **the** control room, the OSC, and EOF.
			5.1.4 The TSC ventilation system includes a high-efficiency particulate air **(HEPA)**, and charcoal filter and radiation monitors are installed. **Controls and displays exist in the TSC to control and monitor the status of the TSC ventilation system including heating and cooling, and the activation of the HEPA and charcoal filter system upon detection of high radiation in the TSC.**
			5.1.5 The TSC has the means to receive, store, process, and display plant and environmental information **as listed in DCD Table 7.5-1 and FSAR Table 7.5-201**, and to initiate emergency measures and conduct emergency assessment. ~~These capabilities have been demonstrated during testing and acceptance activities.~~
			5.1.6 A reliable and back-up electrical power supply is available for the TSC.
			5.1.7 There is an OSC located inside the Protected Area. It is separate from the control room~~(s)~~.
			5.1.8 Communications equipment is installed, and voice transmission and reception are accomplished between the OSC and OSC teams, the TSC and ~~each~~ **the** control room.

Table 3.8-1 (Sheet 5 of 18)
Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
5.0 Emergency Facilities and Equipment (cont.)			
	5.2 The licensee has established an EOF. [H.2]	5.2 An inspection of the EOF will be performed, including a test of the capabilities.	5.2.1 The EOF working space size is approximately 4000 square feet consistent with NUREG-0696 (75 square feet/person) and is large enough for required systems, equipment, records, and storage. ~~Distance at or beyond 10 miles of the TSC. Built to meet the criteria of the county building code.~~
			5.2.2 Communications equipment is installed, and voice transmission and reception are accomplished between the control room~~s~~, TSC, EOF, field monitoring teams, NRC, state and county agencies, and emergency news center.
			5.2.3 Radiological data identified in each Plan Annex, meteorological data, and plant system data pertinent to determining offsite protective measures ~~are~~ **as listed in DCD Table 7.5-1 and FSAR Table 7.5-201 are available and** displayed in the EOF, when activated.
6.0 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.	6.1 The means exist to provide initial and continuing radiological assessment throughout the course of an accident. [I.2]	6.1 A test will be performed to demonstrate that the means exist to provide initial and continuing radiological assessment throughout the course of an accident through the plant computer or communications with ~~each~~ **the** control room, TSC, and EOF during the course of drills and/or exercises.	6.1 The means are available to provide initial and continuing radiological assessment through displays of instrumentation indicators in ~~each~~ **the** control room, ~~and for each unit in the~~ TSC and EOF during the course of drills and/or exercises.

Table 3.8-1 (Sheet 6 of 18)
Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
6.0 Accident Assessment (cont.)			
	6.2 The means exist 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. [I.3]	6.2 A test will be performed to demonstrate that the means exist 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.	6.2 Emergency Plan implementing procedures, through use in training and drills, provide direction to accurately calculate the source terms and the magnitude of the release of postulated accident scenario releases.
	6.3 The means exist to continuously assess the 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. [I.4]	6.3 A test will be performed to provide evidence that the impact of a radiological release to the environment is able to be assessed by using the relationship between effluent monitor readings, and onsite and offsite exposures and contamination for various meteorological conditions.	6.3 Demonstrate that the means exist to continuously assess the 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 under drill conditions.
	6.4 The means exist to acquire and evaluate meteorological information. [I.5]	6.4 A test will be performed to acquire and evaluate meteorological data/ information.	6.4 Meteorological data exists at the EOF, TSC, control room~~(s)~~, offsite NRC operations center, and the state of Florida, and that this data is in the format needed for the appropriate emergency plan implementing procedures.
	6.5 The means exist to determine the release rate and projected doses if the instrumentation used for assessment is off-scale or inoperable. [I.6]	6.5 A test will be performed of the capabilities to determine the release rate and projected doses if the instrumentation used for assessment is off-scale or inoperable.	6.5 The release rate and projected doses can be determined with offscale or inoperable instrumentation during training or a drill.
	6.6 The means exist for field monitoring within the plume exposure EPZ. [I.7]	6.6 A test will be performed of the capabilities for field monitoring within the plume exposure EPZ.	6.6 The field monitoring teams were dispatched and demonstrated ability to locate and monitor a radiological release within the plume exposure EPZ.

Table 3.8-1 (Sheet 14 of 18)
Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (cont.)			
			D. Emergency Response Facilities (cont.) c. The Radiation Protection Manager (TSC) implements the designated checklist if an onsite/offsite release has occurred. **d. Demonstrate the capability of TSC and EOF equipment and data displays to clearly identify and reflect the affected unit.** 3. Demonstrate the adequacy of communications for all emergency support resources. Standard Criteria: **a.** Emergency response communications listed in the EPIPs are available and operational. ~~a.~~**b.** Communications systems are tested in accordance with the TSC, OSC, EOF and ENC activation checklists. ~~b.~~**c.** Emergency response facility personnel are able to operate all specified communications systems. ~~c.~~**d.** Clear primary and backup communications links are established and maintained for the duration of the exercise.

Table 3.8-1 (Sheet 15 of 18)
Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
			E. Radiological Assessment and Control 1. Demonstrate the ability to obtain onsite radiological surveys and samples. Standard Criteria: a. HP Technicians demonstrate the ability to obtain appropriate instruments (range and type) and perform surveys. b. Airborne samples are taken when the conditions indicate the need for the information. 2. Demonstrate the ability to continuously monitor and control radiation exposure to emergency workers. Standard Criteria: a. Emergency workers are issued self-reading dosimeters when radiation levels require, and exposures are controlled to 10 CFR Part 20 limits (unless the Emergency Coordinator authorizes emergency limits for onsite ERO personnel and the Emergency Offsite Manager authorizes emergency exposures for offsite ERO personnel.) b. Exposure records are available either from the Site database or a hard copy dose report. ~~b. Exposure records are available either from the Site database or a hard copy dose report.~~

Table 3.8-1 (Sheet 18 of 18)
Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (cont.)			
			E. Radiological Assessment and Control (cont.) b. PARS are developed within 15 minutes of data availability. c. PARs are transmitted via voice, fax, or electronically within 15 minutes as required by the EPIPs.
			8.1.2 Onsite emergency response personnel were mobilized in sufficient numbers to fill emergency response positions identified in the Radiological Emergency Plan, Part 2, Section B, Emergency Response Organization, and they successfully performed their assigned responsibilities.
			8.1.3 The exercise was completed within the specified time periods of Appendix E to 10 CFR Part 50, offsite exercise objectives were met, and there were no uncorrected offsite exercise deficiencies, or a license condition ~~requiring~~ **requires** offsite deficiencies to be corrected prior to operation above 5% of rated power.
9.0 Implementing Procedures			
10 CFR Part 50, App. E.V — No less than 180 days prior to the scheduled issuance of an operating license for a nuclear power reactor or a license to possess nuclear material, the applicant's detailed implementing procedures for its emergency plan shall be submitted to the Commission.	9.1 The licensee has submitted detailed implementing procedures for its emergency plan no less than 180 days before fuel load.	9.1 Confirm that the submittal letter was submitted on time.	9.1 The date of the submittal letter from the licensee demonstrates that the detailed Emergency Plan Implementing Procedures (EPIPs) for the onsite emergency plan were submitted no less than 180 days prior to fuel load.

ASSOCIATED ENCLOSURES:

None