

PMLevyCOLPEm Resource

From: Wilkins, Tillie [tillie.wilkins@pgnmail.com]
Sent: Tuesday, June 19, 2012 5:21 PM
To: Habib, Donald
Subject: Supplement 1 to LNP-RAI-LTR-108
Attachments: [Untitled].pdf

Don – An advance copy of our supplemental response to Levy RAI-LTR-108 is attached.; formal distribution to follow.

Tillie Wilkins

Nuclear Plant Licensing

New Generation Programs & Projects

Progress Energy

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From: Wilkins, Tillie

Created By: tillie.wilkins@pgnmail.com

Recipients:
"Habib, Donald" <Donald.Habib@nrc.gov>
Tracking Status: None

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Serial: NPD-NRC-2012-019
June 19, 2012

10CFR52.79

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

**LEVY NUCLEAR PLANT, UNITS 1 AND 2
DOCKET NOS. 52-029 AND 52-030
SUPPLEMENT 1 TO RESPONSE TO NRC RAI LETTER 108 – IMPLEMENTATION OF
FUKUSHIMA NEAR-TERM TASK FORCE RECOMMENDATIONS**

- Reference:
1. Letter from Mark Tonacci (NRC) to John Elnitsky (PEF), dated March 15, 2012, "Request for Additional Information Letter No. 108 Concerning Implementation of Fukushima Near-Term Task Force Recommendations."
 2. Letter from John Elnitsky (PEF) to Nuclear Regulatory Commission (NRC), dated April 12, 2012, "30-Day Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term task Force Recommendations," Serial: NPD-NRC-2012-012.
 3. Letter from John Elnitsky (PEF) to Nuclear Regulatory Commission (NRC), dated April 25, 2012, Response to NRC RAI Letter 108 – Implementation of Fukushima Near-Term task Force Recommendations," Serial: NPD-NRC-2012-014.

Ladies and Gentlemen:

Progress Energy Florida, Inc. (PEF) hereby submits a supplemental response to the Nuclear Regulatory Commission's (NRC) request for additional information provided in Reference 1.

A revised response to one of the four NRC actions identified in the RAI dealing with Emergency Preparedness Recommendation 9.3 is contained in the enclosure and replaces the previous response contained in Reference 3.

If you have any further questions, or need additional information, please contact Bob Kitchen at (919) 546-6992, or me at (727) 820-4481.

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

Executed on June 19, 2012.

Sincerely,

A handwritten signature in blue ink, appearing to read 'John Elnitsky', is written over a printed name and title.

John Elnitsky
Vice President
New Generation Programs & Projects

Progress Energy Carolinas, Inc.
P.O. Box 1551
Raleigh, NC 27602

United States Nuclear Regulatory Commission
NPD-NRC-2012-019
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Enclosure

cc : U.S. NRC Region II, Regional Administrator
Mr. Don Habib, U.S. NRC Project Manager

**Levy Nuclear Plant Units 1 and 2
Supplement 1 to response to NRC Request for Additional Information Letter No. 108
Related to Implementation of Fukushima Near Term Task Force Recommendations,
Dated 3/15/2012**

<u>NRC RAI #</u>	<u>Progress Energy RAI #</u>	<u>Progress Energy Response</u>
01.05-1	L-0998	Future response per Serial: NPD-NRC-2012-012, 4/12/2012
01.05-1	L-0999	April 25, 2012; NPD-NRC-2012-014
01.05-1	L-1000	April 25, 2012; NPD-NRC-2012-014
01.05-1	L-1002	Revised response enclosed -- see following pages

NRC Letter No.: LNP-RAI-LTR-108

NRC Letter Date: March 15, 2012

NRC Review of Final Safety Analysis Report

NRC RAI NUMBER: 01.05-1

Text of NRC RAI:

Subject: Request for Additional Information Letter No. 108 Concerning Implementation of Fukushima Near-term Task Force (NTTF) Recommendations

Bullet 4

Determine and implement the required staff to fill all necessary positions for responding to a multi-unit event, conduct periodic training and exercises for multiunit and prolonged station blackout (SBO) scenarios, ensure that emergency preparedness equipment and facilities are sufficient for dealing with multi-unit and prolonged SBO scenarios, provide a means to power communications equipment needed to communicate onsite and offsite during a prolonged SBO and maintain the Emergency Response Data System capability throughout the accident (detailed Recommendation 9.3 - Enclosure 7 to SECY-12-0025).

PGN RAI ID #: L-1002

PGN Response to NRC RAI:

Bullet 4

PEF's response to this item is based on Recommendation 9.3 of SECY-12-0025 Enclosure 7. PEF proposes a license condition as set forth in this enclosure to address Bullet 4 of RAI No. 01.05-1.

In a letter from the NRC to NEI (ADAMS Accession No. ML12131A043), the NRC staff indicated that NEI-12-01, Revision 0, dated May 2012, was found to be an acceptable method for licensees to employ when responding to the 10 CFR 50.54(f) letters regarding NTTF Recommendation 9.3. Due to the future timing of performing the communication and staffing analysis for the LNP, PEF has chosen wording in the proposed license condition that takes into account the possibility of future revisions to NEI 12-01 or other NRC approved guidance that may be issued based on lessons learned during assessments performed by existing plants ("...assessment will be performed in accordance with NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities", or other NRC approved guidance in effect six months prior to commencement of the assessment.")

The proposed license condition has a milestone of at least 2 years prior to scheduled fuel load to support completion prior to the full participation Emergency Planning (EP) exercise with one exception. The implementation of corrective actions identified in the communications capability assessment is set at least 180 days prior to scheduled initial fuel load to support any required equipment installation which may not be possible at an earlier time in a plant under construction. The limit of 180 days prior to scheduled initial fuel load for completion of the corrective actions is also consistent with a completion milestone for Emergency Planning program implementation described in FSAR Chapter 13.

Recommendation 9.3 of SECY-12-0025 Enclosure 7 includes request for information items beyond those directing the communications and staffing analysis. Some of these items are not explicitly stated in the proposed license condition since they are addressed in NEI 12-01, Revision 0.

Proposed LNP License Condition:

EMERGENCY PLANNING ACTIONS

Communications

At least two (2) years prior to scheduled initial fuel load, PEF shall have performed an assessment of on-site and off-site communications systems and equipment required during an emergency event to ensure communications capabilities can be maintained during prolonged station blackout conditions. The communications capability assessment will be performed in accordance with NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities", or other NRC approved guidance in effect six months prior to commencement of the assessment.

At least one hundred eighty (180) days prior to scheduled initial fuel load, PEF shall complete implementation of corrective actions identified in the communications capability assessment described above, including any related emergency plan and implementing procedure changes and associated training.

Staffing

At least two (2) years prior to scheduled initial fuel load, PEF shall have performed an assessment of the onsite and augmented staffing capability to satisfy the regulatory requirements for response to a multi-unit event. The staffing assessment will be performed in accordance with NEI 12-01, "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities", or other NRC approved guidance in effect six (6) months prior to commencement of the assessment.

At least two (2) years prior to scheduled initial fuel load, PEF shall revise the LNP Emergency Plan to include the following:

- Incorporation of corrective actions identified in the staffing assessment described above.
- Identification of how the augmented staff will be notified given degraded communications capabilities.

Attachments/Enclosures:

None