

PMLevyCOLPEm Resource

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Sent: Thursday, July 19, 2012 4:06 PM
To: Habib, Donald
Cc: Kitchen, Robert; Taylor, Larry; Wilkins, Tillie
Subject: Part 5 Emergency Plan Change Pages
Attachments: Changed Pages from Part 5 LNP_EP_Rev4 draft_RL_SO.pdf

Don

As requested, please see attached per request from EP reviewer on today's public call.

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**Levy Nuclear Plant Units 1 and 2
COL Application
Part 5, Emergency Plan**

- d. Report Preparation Director: The Report Preparation Director is located in the EOF and reports to the EOF Director; responsible for initiating notifications to the state and counties of emergency status.
- e. Technical Support Coordinator: The Technical Support Coordinator is located in the EOF and reports to the EOF Director; responsible for assisting the TSC Accident Assessment Team in identifying accident mitigation activities and monitoring critical safety system functions.
- f. Representatives to the State/County EOCs: The representatives to the State/County EOCs are located at the following:

FL State EOC	State Administrative Building in Tallahassee, FL
Citrus County EOC	Lecanto, FL
Levy County EOC	Bronson, FL
Marion County EOC	Ocala, FL

These representatives act as technical liaisons to facilitate communications and the coordination of information flow between the EC or EOF Director and state/local authorities. They report to the Assistant EOF Director.

- g. Emergency News Center (ENC): The ENC Staff is responsible for dissemination of information to the public and the news media under the direction of the Public Information Director.

Outside organizations that support LNP in an emergency include CR3 and other organizations as described in **Section A**, Assignment of Responsibility (Organizational Control).

6. INTERFACES BETWEEN FUNCTIONAL AREAS

Figure A-1 illustrates the interfaces among functional areas of LNP emergency response activity, Progress Energy corporate support, and the affected state, local, and federal government response organizations.

7. CORPORATE SUPPORT FOR THE PLANT STAFF

Within the overall **corporate** organization ~~of Progress Energy~~, additional elements exist to directly control and support the operation of LNP. The Plant General Manager and the entire LNP staff are a part of the ~~Progress Energy~~ Nuclear Operations-Generation organization, ~~headed by the~~ **The Plant General Manager reports to the Vice President Site Executive, Levy Nuclear Plant, The Vice President, Levy Nuclear Plant who, in turn, reports to the Senior Vice President – Nuclear Operations Site Group. The Senior Vice President – Nuclear Operations**

Rev. 3Rev. 4

**Levy Nuclear Plant Units 1 and 2
COL Application
Part 5, Emergency Plan**

Site Group reports to the Executive Vice President – Nuclear Generation and/ Chief Nuclear Officer, ~~Nuclear Generation~~, who, in turn, reports to the President and Chief Executive Officer – ~~Progress-Duke Energy Inc.~~

~~In addition to Plant Operations, the Nuclear Operations~~The Nuclear Generation organization consists of organizational elements that provide additional administrative and technical support to ensure continued safe plant operation in compliance with operational commitments and applicable licensing requirements and regulations. These elements include Engineering, Support Services, Training, and Nuclear ~~Assessments~~Oversight.

Upon declaration of an Alert, Site Area Emergency, General Emergency, or Unusual Event, if conditions warrant, the EC directs the activation and notification of the on-site and off-site Emergency Response Facilities (ERFs). Progress Energy management, technical, and administrative personnel staff the EOF and other facilities and provide augmented support for the plant staff as shown in Table B-1.

In addition to the minimum required staff, additional personnel report to the EOF to augment the minimum staff. This augmentation would occur within the required time specified in Table B-1.

In the event of an emergency at LNP that requires personnel and other support resources beyond those available within the LNP Emergency Organization, augmentation is available from various off-site organizations. Primary off-site support is available from the Nuclear Generation ~~Group~~ organization. This support is initiated upon activation of the EOF. Corporate support is also available as described in plant procedures. The following list describes other areas of support within this Plan.

- a. Logistics support for emergency personnel is addressed in Section A and Section B of this Plan.
- b. Technical support for planning and reentry/recovery operations is addressed in Section M of this Plan.
- c. The EOF Director has the ultimate responsibility for directing the corporate emergency response. Corporate support is coordinated between the Emergency Coordinator and the EOF Director. The EOF Director and staff serve as the point of contact among LNP personnel, the corporate emergency response staff, and governmental authorities.
- d. The Corporate Communications organization coordinates with governmental authorities and controls the release of information to news media during emergencies. Section G of this Plan discusses the public information function.

**Levy Nuclear Plant Units 1 and 2
COL Application
Part 5, Emergency Plan**

**P. RESPONSIBILITY FOR THE PLANNING EFFORT: DEVELOPMENT,
PERIODIC REVIEW AND DISTRIBUTION OF EMERGENCY PLANS**

This section addresses responsibilities associated with planning efforts. For example, Progress Energy implements an organizational structure and processes to ensure that this Plan is periodically reviewed, updated, audited, distributed, and controlled consistent with facility quality assurance and document control requirements. Progress Energy also implements a program to ensure personnel responsible for the emergency planning effort receive training appropriate to their duties and responsibilities.

1. TRAINING

Progress Energy develops and implements a process to ensure the Emergency Preparedness Supervisor and support staff are properly trained for effective implementation of the emergency planning effort, consistent with applicable regulatory requirements and guidance, license conditions, other commitments, and accepted good practices. Training is primarily through on-the-job related to Plan preparation, periodic revisions, or drills and exercises. Other training may include formal education, professional seminars, plant-specific training, industry meetings, and other activities and forums that provide for an exchange of pertinent information.

**2. RESPONSIBILITY FOR RADIOLOGICAL EMERGENCY RESPONSE
TRAINING**

The Vice President, ~~Nuclear Operations~~ **Corporate Governance and Operations Support** holds the overall authority and responsibility for ensuring that an adequate level of emergency preparedness is maintained. Responsibility for the planning effort is delegated to the Emergency Preparedness Supervisor.

3. EMERGENCY PLANNING COORDINATION

The Emergency Preparedness Supervisor is designated as the Emergency Planning Coordinator, having lead responsibility for emergency planning. This individual is responsible for developing and updating the LNP Emergency Plan and coordination of this Plan with other response organizations. The Progress Energy corporate staff may augment these on-site efforts, as needed, to ensure a comprehensive emergency preparedness effort.

4. PLAN REVIEWS AND UPDATES

The Emergency Planning Coordinator will coordinate the updating of the Emergency Plan, Plant Emergency Procedures (PEPs), and Supporting Agreements, as needed, and will review and certify them to be current on an annual basis. Any revisions to the Plan will be reviewed in accordance with 10 CFR 50.54(q) requirements.

**Levy Nuclear Plant Units 1 and 2
COL Application
Part 5, Emergency Plan**

On an annual basis, the Emergency Planning Coordinator reviews the LNP procedures for emergency classification with the state and any affected local organizations. The annual review includes the content of the EALs with the state and county authorities.

5. DISTRIBUTION OF REVISED PLANS

Upon completion of the annual review, the Emergency Planning Coordinator or designee incorporates any necessary changes. Changed pages are marked and dated to highlight the changes.

Following approval of the updated plan by the ~~Vice President~~ Site Executive, **Levy Nuclear Plant**, the LNP document control organization distributes the updated plan to organizations/individuals with responsibility for implementing the plans.

6. SUPPORTING PLANS

Other plans that support this Plan are:

- a. The State of Florida Radiological Emergency Management Plan (Annex A to the State of Florida Comprehensive Emergency Management Plan) (**Reference O**).
- b. Appendix VI of the State Plan (Levy Nuclear Plant Site Plan) (**Reference O**).
- c. Citrus County Sheriff's Office Radiological Emergency Preparedness (Rep) Plan For Crystal River and Levy Nuclear Power Plants (**Reference EE**).
- d. Levy County Emergency Management Radiological Emergency Preparedness Plan (**Reference FF**).
- e. Marion County Emergency Management Radiological Emergency Preparedness (REP) Plan For the Levy Nuclear Power Plant (**Reference GG**).
- f. U.S. Nuclear Regulatory Commission, NUREG-0728, NRC Incident Response Plan (**Reference Y**).
- g. National Response Framework (**Reference J**).
- h. NRC Region II Incident Response Plan.
- i. Institute of Nuclear Power Operations (INPO) Emergency Response Plan.
- j. Citrus Memorial Hospital "Nuclear Accident Plan"
- k. Seven Rivers Regional Medical Center "Radioactive Material Contamination Response Plan"

**Levy Nuclear Plant Units 1 and 2
COL Application
Part 5, Emergency Plan**

7. IMPLEMENTING PROCEDURES

Appendix 5 of this Plan provides a topical listing of implementing procedures and administrative procedures that support this Plan and includes the section(s) of the Plan to be implemented by each procedure.

Certain emergency plan features recommended by NUREG-0654 (e.g., Evaluation Criterion I.3, which addresses methods and techniques for determining source terms and the magnitude of releases) are procedural in nature and have been appropriately placed in LNP procedures. Changes to the affected portions of these procedures are developed and approved consistent with the requirements of 10 CFR 50.54(q) and the guidance provided in NRC Regulatory Information Summary 2005-02, "Clarifying the Process for Making Emergency Plan Changes (Ref III.A. 28)."

8. TABLE OF CONTENTS AND NUREG-0654 CROSS REFERENCE

This Plan contains a specific table of contents. Additionally, the format for this Emergency Plan directly follows the format of NUREG-0654, Rev. 1.

9. EMERGENCY PLAN AUDITS

Progress Energy's Nuclear ~~Assessment-Oversight Section-organization~~ performs, or oversees the performance of, periodic independent audits of the Emergency Preparedness Program consistent with the requirements of 10 CFR 50.54(t). The audits include, at a minimum, the following:

- a. The Emergency Plan.
- b. Emergency Plan Implementing Procedures and practices.
- c. The Emergency Preparedness Training Program.
- d. Readiness testing (e.g., drills and exercises).
- e. Emergency response facilities, equipment, and supplies.
- f. Interfaces with state and local government agencies.
- g. Required records and documentation.

Progress Energy's Nuclear ~~Assessment-Oversight Section-organization~~ ensures that all audit findings are subject to management controls consistent with the facility's corrective action program.

Progress Energy establishes and maintains the frequency of the periodic audits based on an assessment of performance as compared to performance indicators; however, the audit frequency may not be less than once every 24 months. In addition, Progress Energy conducts a program audit as soon as

**Levy Nuclear Plant Units 1 and 2
COL Application
Part 5, Emergency Plan**

reasonably practicable after a change occurs in personnel, procedures, equipment, or facilities that could potentially adversely affect emergency preparedness, but no longer than 12 months after the change.

Progress Energy's Nuclear ~~Performance Oversight Section~~ organization documents audit results and improvement recommendations and reports these results to the LNP facility and Progress Energy management. Progress Energy makes those portions of the audits that address the adequacy of interfaces with state and local governments available to the affected governments.

Records Management shall file and maintain the following records for 5 years:

- a. The review results and recommended improvements.
- b. The answers to the recommended improvements.
- c. A description of the corrective actions taken.

10. EMERGENCY TELEPHONE NUMBERS

The Emergency Planning Coordinator, or designee, is responsible for performing a quarterly review of the telephone numbers in emergency response procedures and for ensuring required revisions are completed.