

10 CFR 50.4(b)(5)(iii)
10 CFR 50.54(q)(5)
10 CFR 50, Appendix E, Section V

June 20, 2013
3F0613-02

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

Subject: Crystal River Unit 3 – Revision to the Radiological Emergency Response Plan
Implementing Procedure

Dear Sir:

In accordance with 10 CFR 50.4(b)(5)(iii), 10 CFR 50.54(q)(5), and 10 CFR 50, Appendix E, Section V, Duke Energy Florida, Inc., formerly known as Florida Power Corporation, hereby submits a revision to the Radiological Emergency Response Plan implementing procedure for Crystal River Unit 3 (CR-3).

CR-3 has evaluated this revision, in accordance with 10 CFR 50.54(q), and determined the revisions do not reduce the effectiveness of the CR-3 Radiological Emergency Response Plan and the Plan continues to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E.

Enclosure 1 identifies the revised Radiological Emergency Response Plan implementing procedure. Enclosure 2 provides a 10 CFR 50.54(q)(5) analysis summary for the revised Radiological Emergency Response Plan implementing procedure. Enclosure 3 provides a copy of the revised Radiological Emergency Response Plan implementing procedure.

There are no new regulatory commitments made within this submittal.

If you have any questions regarding this submittal, please contact Mr. Dan Westcott, Licensing Supervisor at (352) 563-4796.

Sincerely,



Phyllis A. Dixon
Manager – Decommissioning Support – Nuclear
Crystal River Nuclear Plant

PAD/sam

Enclosures: 1. Revision to the Radiological Emergency Response Plan Implementing
Procedure
2. 10 CFR 50.54(q)(5) Analysis Summary
3. Copy of Revised Radiological Emergency Response Plan Implementing
Procedure

xc: NRR Project Manager
Regional Administrator, Region II
Senior Resident Inspector

AX45
NRR

DUKE ENERGY FLORIDA, INC.

DOCKET NUMBER 50 - 302 / LICENSE NUMBER DPR - 72

ENCLOSURE 1

**REVISION TO THE RADIOLOGICAL EMERGENCY RESPONSE
PLAN IMPLEMENTING PROCEDURE**

**REVISION TO THE RADIOLOGICAL EMERGENCY RESPONSE PLAN IMPLEMENTING
PROCEDURE**

Title	Revision	Effective Date
EM-216, Duties of the Fire Brigade	27	05/22/2013

EM = Emergency Plan Implementing Procedure

DUKE ENERGY FLORIDA, INC.

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ENCLOSURE 2

10 CFR 50.54(q)(5) ANALYSIS SUMMARY

10 CFR 50.54(q)(5) ANALYSIS SUMMARY

In accordance with 10 CFR 50.54(q)(5), Duke Energy Florida, Inc., formerly known as Florida Power Corporation, is providing an analysis summary for the revised Radiological Emergency Response Plan (RERP) implementing procedure being submitted with this letter. The analysis summary for changes associated with program elements, administrative changes, and editorial corrections are described below.

EM-216, "Duties of the Fire Brigade," Revision 27

Section 9 was updated to remove "Channel 11" designation used with the former plant radio system. The Crystal River Unit 3 (CR-3) ultra high frequency radio system was replaced with a digital trunking system. The new radios do not have specific channel numbers and are programmed to different talk groups for each plant organization to which they are assigned. The equipment modification affects the means by which CR-3 meets the function to maintain adequate emergency facilities and equipment to support an emergency response, as defined in 10 CFR 50.47(b)(8), and the function to establish systems for prompt communication among principal Emergency Response Organizations, as defined by 10 CFR 50.47(b)(6). The new radio system does not change the severe accident response strategy, but enhances the method of implementing the strategy with more reliable communication equipment. This change does not reduce the effectiveness of any of the Emergency Plan functions. The revised RERP continues to meet the requirements of 10 CFR 50, Appendix E and 10 CFR 50.47(b) planning standards.

Reference: Emergency Response Regulatory Review Action Request (EREG AR) 575639

DUKE ENERGY FLORIDA, INC.

DOCKET NUMBER 50 - 302 / LICENSE NUMBER DPR - 72

ENCLOSURE 3

**COPY OF REVISED RADIOLOGICAL EMERGENCY
RESPONSE PLAN IMPLEMENTING PROCEDURE**

CRYSTAL RIVER UNIT 3

PLANT OPERATING MANUAL

EMERGENCY PLAN IMPLEMENTING PROCEDURE

EM-216

DUTIES OF THE FIRE BRIGADE

REVISION 27

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1.0 PURPOSE

1. The purpose of this procedure is to provide the Fire Brigade with response instructions in the event of fire both inside and outside the Protected Area. [R5]

2.0 REFERENCES

2.1 Developmental References

1. AI-2205, Administration of the CR-3 Fire Brigade Organization and Duties of the Fire Brigade
2. CAP-NGGC-0200, Condition Identification and Screening Process
3. CR-3 Fire Protection Plan
4. EM-103, Operation and Staffing of the CR-3 Control Room during Emergency Classifications
5. EMG-CRFF-00002, Crystal River Fossil Plants Emergency Procedure – Fire Emergency Plan
6. Radiological Emergency Response Plan
7. TPP-219, Emergency Response Organization Training Program
8. [R1] NOCS 01710
9. [R2] NOCS 01822
10. [R3] NOCS 04530
11. [R4] NOCS 04617
12. [R5] NOCS 04569
13. [R6] NOCS 04618
14. [R7] NOCS 04619
15. [R8] NOCS 04752
16. [R9] NOCS 04753
17. [R10] NOCS 04760
18. [R11] NOCS 04791
19. [R12] NOCS 04792

3.0 DEFINITIONS

1. **Declared Emergency:** The Radiological Emergency Response Plan has been entered and an Unusual Event, Alert, Site Area Emergency, or General Emergency has been declared.
2. **Fire Team Leader:** An individual who is qualified per AI-2205, "Administration of CR-3 Fire Brigade Organization and Duties of The Fire Brigade."
3. **Fire Brigade:** An organized group of employees within an industrial occupancy who are knowledgeable, trained, and skilled in at least basic fire fighting operations, and whose full-time occupation might or might not be the provision of fire suppression and related activities for their employer.
4. **Shift Fire Brigade Team:** A designated team of 5 members, selected from the Fire Brigade roster, composed each operating shift and who are assigned as the primary responder to a fire emergency during that shift.
5. **Incident Commander:** The individual responsible for directing the activities of fire brigades mustered from the several site facilities to fight a fire. The incident commander is the first responding qualified person who assumes command of the fire scene that will regulate and maintain all fire fighting activities until he is relieved by a more qualified Fire Team Leader or ERC. The term is used primarily by the Crystal River Fossil Plants Emergency Procedure - Fire Emergency Plan.
6. **Emergency Response Coordinator (ERC):** A position defined in the Crystal River Fossil Plants Emergency Procedure - Fire Emergency Plan. This individual is qualified in fire command techniques and strategies. The coordinators have the skills necessary for fire fighting strategy and tactics, fire suppression and prevention techniques, leadership principles, pre-fire planning, and safety practices. The ERC is an Incident Commander during a fire emergency.

4.0 RESPONSIBILITIES [R6, R8]

1. The Fire Team Leader is responsible for:
 - a. Directing fire fighting operations.
 - b. Coordinating fire response with the Shift Manager (SM) or Emergency Coordinator to ensure the Fire Brigade members take appropriate protective actions prior to entering an evacuated area during a declared emergency.
2. The Fire Team Leader has the authority to regulate access into the fire area, consistent with the orders from the SM/Emergency Coordinator and duties of other Emergency Team support.
3. The Fire Brigade members are responsible for fighting fires within the confines of Crystal River Unit 3 and performing functions as assigned during emergencies.

5.0 PREREQUISITES

None

6.0 PRECAUTIONS, LIMITATIONS, AND NOTES

1. Fire Brigade members who are on duty and selected for the Shift Fire Brigade Team will **NOT** have duties that would conflict with the member's ability to respond to a fire emergency. [R7]
2. In the event of a site evacuation, other than a security threat, the dedicated Shift Fire Brigade Team members will report to the Control Room Break Area with fire fighting turn-out gear, Self Contained Breathing Apparatus (SCBA) and portable radios. REFER to EM-911 for security threats.
3. Fire Brigade members, other than the dedicated Shift Fire Brigade Team, who have evacuated the protected area, should report to the second floor east end conference Room in the Site Administration Building unless otherwise directed by the Fire Team Leader, SM/Emergency Coordinator, or designee.
4. Water on fires in the vicinity of energized high voltage electrical equipment constitutes a life hazard to personnel due to the electrical conductivity of water. The industry standard is that 10 feet in fog pattern is acceptable for electrical equipment that is <10 kV. Water hoses should be operated with a fog nozzle from a distance of more than 10 ft. from any energized electrical equipment.
5. The Fire Team Leader has the authority to make the final determination to use water in combating fires involving energized high voltage electrical equipment.

7.0 SPECIAL TOOLS AND EQUIPMENT

None

8.0 ACCEPTANCE CRITERIA

None

9.0 INSTRUCTIONS [R8, R10]

9.1 Response to Fires inside CR-3 Protected Area

NOTE: The Shift Fire Brigade Team response continues to be coordinated through the on-duty SRO in accordance with EM-103 during emergencies, independent of TSC activation.

1. **WHEN** a fire alarm sounds **AND/OR** verbal notification of the fire location is given, **THEN** the Fire Team Leader must:
 - RESPOND directly to the fire scene
 - RESPOND with a portable radio
 - ENSURE a Trauma Kit is brought to the fire scene
 - DRESS-OUT in full turn out gear if required by fire ground operations

NOTE: Two complete sets of turn-out gear are located on the fire cart for use by the Fire Team Leader and the fire cart driver.

2. The Shift Fire Brigade Team member assigned to drive the fire cart responds with the fire cart to the fire. The fire cart is positioned at a safe location in the vicinity of the fire where it will **NOT** interfere with fire-fighting activities. [R11]

CAUTION

In the event of a fire in a radiation area, the protection of life and property from fire may be more consequential to personnel than the radiological hazard itself. Only when it has been determined or suspected that the fire is in an unusually high radiation area or very high airborne radioactivity area should the radiological effort be permitted to interfere with extinguishing the fire.

NOTE: Four (4) portable radios, dedicated for Fire Brigade use, must be kept by Shift Fire Brigade Team members on their person during their shift.

3. The Shift Fire Brigade Team must: **[R1]**
 - DRESS as quickly as possible in full turn-out gear, SCBA and portable radio
AND
 - REPORT to the Fire Team Leader at the location designated over the PA and radio, ready to start rescue and fire-fighting operations
4. The Fire Team Leader ensures Security controls access into the fire area and MAY commandeer non-essential personnel to perform non-hazardous fire protection activities.

NOTE: The CR-3 Pre-Fire Plans (Procedure Numbers AI-2205A through F) are located in the Control Room and on each fire cart to provide information and guidance to the Nuclear Fire Team Leader in determining fire-fighting strategies. **[R3], [R9]**

5. The Fire Team Leader assigns Shift Fire Brigade Team members to specific duties as the situation requires (i.e.): **[R4]**
 - Hose advance personnel
 - Nozzle personnel
 - Communications
 - Search and Rescue
 - Salvage and Overhaul
6. The operator(s) in the Control Room monitor emergency messages from Plant Line 1, plant radio, and PAX 5555.
7. The Fire Team Leader informs the SM/Emergency Coordinator of progress in mitigating the fire emergency. **[R12]**

9.2 Response to Fires outside CR-3 Protected Area

NOTE: In accordance with the Crystal River Fossil Plants Emergency Procedure – Fire Emergency Plan, for fires at the Crystal River Energy Complex outside of the CR3 Protected Areas, when two or more ERC's have combined at the fire scene, or when the local Fire Department(s) respond to assist the ERCs, they shall be known as the Fire Task Force. The Incident Commander will retain responsibility for the Fire Task Force. Progress Energy and the Citrus County Fire Departments have a mutual aid program whereby the Fire Departments respond if called upon to assist the Fire Task Force.

1. The Fire Team Leader and Shift Fire Brigade Team members DO not respond to fire events outside of the CR-3 protected area.
2. At the discretion of the SM, Fire Brigade members who are not assigned to the Shift Fire Brigade Team respond to fire scenes outside of the protected area, when requested by the Incident Commander.
3. If fire brigade members respond to assist fire brigades from other facilities, then dress as quickly as possible in full fire fighting turn-out gear including Self Contained Breathing Apparatus (SCBA) and portable radio and report to the Incident Commander at the location designated over the PA and radio, ready to start rescue and fire-fighting operations.
4. Security permits the Fire Brigade to respond to the fire through the vehicle gate.

NOTE: Portable fire-fighting equipment is generally available outside the protected area. Therefore, the fire cart or any other equipment is not taken outside of the protected area unless released by the SM.

5. A Fire Brigade member designated by the Control Room Supervisor (CRS)/SM provides a progress report to the SM/Emergency Coordinator, indicating if the Fire Brigade is committed to fire suppression activities, and advising if additional backup assistance is required.
6. If a fire emergency is in progress within the protected area, then fire Brigade members do not respond to a fire outside the protected area unless directed by the SM/Emergency Coordinator.
7. If Fire Brigade members have responded to a fire outside the protected area and a fire within the protected area occurs, then those members continue to support the Incident Commander. The CR-3 SM/Emergency Coordinator evaluates manpower resources and, if necessary, notifies off-duty Fire Brigade personnel.

9.3 Reports

1. A Condition Report (CR) describing the fire shall be initiated per CAP-NGGC-0200, Condition Identification and Screening Process.
2. The Nuclear Fire Protection staff is responsible for reporting and documenting fire incidents. The Nuclear Operations Department should complete a CR on the incident to be used in furnishing information for the Fire Critique.

10.0 RECORDS

None

SUMMARY OF CHANGES
PRR 570009

- NOTES:** 1. Writers, Reviewers, and Procedure Sponsors: Ensure that any changes to this procedure that affect information contained in ERF posters, Enclosures, briefing cards, guidelines, etc. are made to those items as well.
2. Writers, Reviewers, and Procedure Sponsors: Changes to certain parts of this procedure may impact other EIPs. Ensure appropriate PRRs are initiated as needed.

SECTION/STEP	CHANGES
9.1.6	Per EC 84174, Install New Plant Radio System, deleted the "Channel 11" designation. New radios do not have specific channel numbers, each radio is programmed to different talk groups for each plant organization to which they are assigned.