



ND-2013-0040
December 18, 2013

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

Subject: **PSEG Early Site Permit Application**
Docket No. 52-043
Implementation of Emergency Preparedness Rule Changes

- References: 1) PSEG Power, LLC letter ND-2013-0006 to USNRC, Submittal of Revision 2 of the Early Site Permit Application for the PSEG Site, dated March 27, 2013
- 2) PSEG Power, LLC letter ND-2012-0046 to USNRC, Implementation of Emergency Preparedness Rule Changes, dated August 29, 2012
- 3) PSEG Power, LLC letter ND-2013-0027 to USNRC, Implementation of Emergency Preparedness Rule Changes, dated August 28, 2013

In Reference 2, PSEG responded to a request from the NRC staff to document PSEG's approach regarding implementation of the Emergency Preparedness Rule changes to 10 CFR 50.47, Part 50.54(q) and Part 50, Appendix E, issued November 23, 2011, for the Emergency Plan submitted as Part 5 of the PSEG Site Early Site Permit Application. The purpose of this letter is to supplement PSEG's response contained in Reference 2, as it relates to the requirements of 10 CFR 50, Appendix E, Section IV.F.2.j, regarding the conduct of hostile action based (HAB) drills.

In Reference 3, PSEG stated that, "In order to maintain consistency between the operating units' Emergency Plans and the PSEG ESP Emergency Plan, PSEG will submit a revision to the ESP Emergency Plan no later than December 31, 2014. This revision will revise the drill cycle frequency to eight years, and will include the requirement to conduct a HAB drill once per drill cycle." This commitment was based on PSEG's operating units Salem and Hope Creek Generating Stations schedule for conducting their first HAB drill in May 2014.

DO79
AX45
MRO

10 CFR 50, Appendix E, Section 1.5 states, "Each applicant for a combined license or early site permit under part 52 of this chapter whose application is docketed before December 23, 2011, may defer compliance with any change to emergency preparedness regulations under the final rule issued November 23, 2011. If that applicant chooses to defer compliance, it shall subsequently request to amend the combined license or early site permit to comply with those changes no later than December 31, 2013. An applicant that does not receive a combined license or early site permit before December 31, 2013, shall revise its combined license or early site permit application to comply with those changes no later than December 31, 2013. Notwithstanding any Commission finding under 10 CFR 52.103(g) regarding the combined license holder's facility, the combined license holder may not operate the facility until the NRC has approved the license amendment demonstrating compliance with the final rule.

The Early Site Permit (ESP) for the PSEG Site will not be issued by December 31, 2013. Therefore, PSEG has revised the ESP application, Part 5, Emergency Plan, to revise the drill cycle duration from six to eight years, and to add a requirement to conduct a HAB drill once during each eight year drill cycle. Enclosure 1 contains the revised Emergency Plan pages. PSEG will provide a complete copy of the revised ESP Emergency Plan in a future revision of the ESP application.

Enclosure 2 documents the regulatory commitment made in this submittal.

If any additional information is needed, please contact David Robillard, PSEG Nuclear Development Licensing Engineer, at (856) 339-7914.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 18th day of December, 2013.

Sincerely,



James Mallon
Early Site Permit Manager
Nuclear Development
PSEG Power, LLC

Enclosure 1: Revised Pages from the ESP Emergency Plan
Enclosure 2: Summary of Regulatory Commitments

cc: USNRC Project Manager, Division of New Reactor Licensing, PSEG Site
(w/enclosures)
USNRC Environmental Project Manager, Division of New Reactor Licensing
(w/enclosures)
USNRC Region I, Regional Administrator (w/enclosures)

PSEG Letter ND-2013-0040 dated December 18, 2013

ENCLOSURE 1

Revised Pages from the ESP Emergency Plan

Pages

15.1

15.2

15.4

15.5

15.6

**PSEG Site
ESP Application
Part 5, Emergency Plan**

SECTION 15

EXERCISES AND DRILLS

1.0 Exercises

An exercise is an event that tests the integrated capability and a major portion of the basic elements existing within emergency plans of the principal response organizations.

1.1 Exercise Schedule

Exercises required by NUREG-0654 are shown in Table 15-1.

The scenario is varied from year to year such that all major elements of the plans and preparedness organizations are tested within an eight-year period. An exercise should start between 6:00 p.m. and 4:00 a.m., once every eight years. Exercises are conducted under various weather conditions.

1.2 Exercise Scenario

Exercises are conducted in accordance with an exercise manual approved by the EP Manager, or designee, that includes, at a minimum, the following elements:

- 1) Exercise objectives
- 2) Date(s), time period, and place(s) for exercise and drill events and the briefings and critiques.
- 3) Participating agencies and locations
- 4) Guidelines for the conduct of the exercise
- 5) Assignments for Referees/Observers and arrangement for official observers for the federally observed biennial exercise.
- 6) Evaluation criteria
- 7) Narrative scenario summary and timeline
- 8) Initiating events
- 9) Test messages
- 10) Operational and radiological data
- 11) Field radiation monitoring data
- 12) Simulated events/actions

Official referees/observers are issued controlled copies of appropriate portions of an exercise manual in advance of an exercise. PSEG limits the scope and timing of this distribution to protect the confidentiality of the exercise scenario.

1.3 Exercise Evaluation

Federal observers/evaluators or drill referees/observers will evaluate based on the adequacy of the emergency response demonstrated for the exercise objectives. Following an exercise, a critique is scheduled to evaluate the ability of the participants to respond to an emergency in accordance with the plan and procedures and to identify any deficiencies in training, facilities, equipment, or procedures.

**PSEG Site
ESP Application
Part 5, Emergency Plan**

The biennial exercise critique consists of a review and analysis of comments from observers and participants with federal observers in attendance, to evaluate the performance and identify areas needing improvement.

The EP Manager reviews all deficiencies identified and ensures corrective actions are assigned appropriately. The NRC evaluated exercise critiques are rolled out to senior management through NRC exit meetings, station morning meetings, and emailing out the final critique report. Corrective actions are tracked for timely resolution or escalated to higher levels of management for action.

An exercise shall test, as a minimum, the following response capabilities:

- 1) Ability of personnel to assess simulated plant conditions and take the appropriate actions.
- 2) Notification, communication, and coordination with the response organizations of the States of New Jersey and Delaware.
- 3) Transfer of emergency coordinator authority and responsibility.
- 4) Staffing of emergency facilities.
- 5) Ability to provide radiological assessment.
- 6) Ability to provide technical evaluation of plant conditions.
- 7) Ability to conduct and coordinate radiological surveys.
- 8) Ability to provide appropriate protective action recommendations.
- 9) Ability to provide appropriate emergency response and initiate recovery management (if scenario allows) from the Emergency Operations Facility (EOF).

2.0 Drills

A drill is a supervised instruction period aimed at developing and maintaining skills in a particular operation. Drills are a training tool to develop and maintain the emergency response organization.

2.1 Drill Schedule

Drills required by NUREG-0654 and 10 CFR 50 Appendix E are shown in Table 15-1 and training may be conducted as a component of an exercise or an evaluation drill in the Emergency Preparedness Training Program shown in Table 16-2.

2.2 Communications Drills

2.2.1 Monthly Communications Drill

The monthly communications drill consists of a test of the primary and/or secondary communications links between the Control Rooms, TSCs and EOF and the appropriate initial state and local government contact points.

A communications drill to NRC Headquarters and the NRC Regional Office Operations Center from the Control Rooms, TSCs and EOF is completed monthly.

**PSEG Site
ESP Application
Part 5, Emergency Plan**

7.0 Radiation Protection Drills

7.1 Semi-Annual Radiation Drill:

The semi-annual radiation drill demonstrates Radiation Protection personnel response to simulated elevated radiation levels in airborne and liquid samples and simulates direct reading of radiation measurements in the environment.

8.0 Other Drills

8.1 Accountability Drill

The annual accountability drill demonstrates the ability of personnel to report to their accountability stations and the accounting of protected area personnel during a simulated emergency. Additionally, security force personnel ensure that the accessible areas of the exclusion zone are simulated to be cleared of contractor personnel, and/or members of the general public.

There are two (2) types of accountability drills that may be performed; full accountability drills or limited accountability drills. A full accountability drill involves participation of all protected area personnel and shall be conducted at least once every eight (8) years. The decision to use a full accountability or a limited accountability drill in any given year will depend on station conditions. During the years that a limited accountability drill is conducted (in lieu of a full accountability drill), station personnel will be provided information that describes the actions required during assembly/accountability. A limited accountability drill involves pre-designated drill participants.

8.2 Team-training Drill

Supervised instruction in which personnel in various emergency response positions work together to accomplish a similar task and demonstrate the ability to perform their assigned functions as a unit.

8.3 Facility Drill

Supervised instruction in which all personnel who are required to perform their emergency response tasks at a facility (e.g., Operations Support Center, Technical Support Center, Emergency Operations Facility, Emergency News Center) demonstrate the ability to perform and integrate their assigned functions within the facility. A facility drill may be a part of a facility tabletop training session.

8.4 Site Drill

Supervised instruction in which the emergency response organization and emergency facilities are activated to demonstrate the ability to integrate the emergency response for the common goal of protecting the health and safety of the public in the event of an emergency at the PSEG Site.

**PSEG Site
ESP Application
Part 5, Emergency Plan**

8.5 Tabletop Training Session

A 90 to 120 minute training activity conducted in specified emergency facilities. This training session provides the ERO facility members an opportunity to review response expectations, discuss lessons learned from other drills or industry events, obtain training on targeted areas, complete qualification cards and to develop a team approach to emergency response.

8.6 Drill Scenario

Drills are performed in accordance with a drill manual, which includes the basic elements required for the type of drill conducted.

8.7 Drill Evaluation

Drills are evaluated to determine the adequacy of the emergency response demonstrated to meet drill objectives and to identify areas needing improvement. The evaluation consists of a critique of the major elements of the drill, by drill coaches and the participants.

Drills are considered part of emergency response training. Corrective actions for deficiencies identified during drills or exercises are taken in accordance with the PSEG Corrective Action Program or as defined in Section 16 of the Emergency Plan.

8.8 Augmentation Drills

Augmentation drills serve to demonstrate the capability of the process to augment the on-shift staff with a TSC, OSC, EOF, and ENC/JIC after declaration of an emergency. An unannounced augmentation drill shall be performed at least once every cycle (8 years).

**PSEG Site
ESP Application
Part 5, Emergency Plan**

**TABLE 15-1
SCHEDULE OF EXERCISES AND DRILLS**

<u>Exercise</u>	<u>Frequency</u>
State of New Jersey/PSEG	Biennially ^{1,2}
State of Delaware/PSEG	Biennially ^{1,2}
 <u>Drill</u>	 <u>Frequency</u>
Communication - State of New Jersey	Monthly
Communication - Salem and Cumberland Counties, New Jersey	Monthly
Communication - State of Delaware	Monthly
Communication - New Castle and Kent Counties, Delaware	Monthly
Communication - Federal (NRC)	Monthly
Communication - Federal (DOE & USCG)	Quarterly
Communication - NOAA Weather	Quarterly
Communication - Ingestion Pathway States (Pennsylvania, Maryland)	Quarterly
Communication - Federal Emergency Response Organizations	Annually
Communication - PSEG Facilities And Field Assessment Teams	Annually
Notification - Pager test	Quarterly
Fire Drill	Not To Exceed Three Months
Medical Emergency (Simulated Contaminated Personnel)	Annually
Radiological Monitoring	Annually
Radiation Protection (Health Physics Drill)	Semi-Annually
Accountability (Full and/or Limited) (A full accountability drill shall be conducted at least once every eight (8) years)	Annually
Augmentation	Once Every Eight Years
EOF Consolidated Functions Drill (multiple units in emergency)	Once Every Eight Years
Hostile Action Based Drill	Once Every Eight Years

¹ May be conducted as separate or coordinated exercise.

² Will consist of events classified as General Emergency.

PSEG Letter ND-2013-0040 dated December 18, 2013

ENCLOSURE 2

Summary of Regulatory Commitments

ENCLOSURE 2

SUMMARY OF REGULATORY COMMITMENTS

The following table identifies commitments made in this document. (Any other actions discussed in the submittal represent intended or planned actions. They are described to the NRC for the NRC's information and are not regulatory commitments.)

COMMITMENT	COMMITTED DATE	COMMITMENT TYPE	
		ONE-TIME ACTION (YES/NO)	PROGRAMMATIC (YES/NO)
PSEG will provide a complete copy of the revised ESP Emergency Plan in a future revision of the ESP application.	March 31, 2014	Yes	No