

PMLevyCOLPEm Resource

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Subject: Levy FSER Table 13.3-1 (EP ITAAC)
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Bob –

The attached table contains the EP ITAAC from the COL applications with NRC staff editorial/grammatical changes shown in redline/strikeout.

Please let me know if you have any questions or would like to discuss these changes in a public teleconference. The changes are intended to be nonsubstantive.

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Table 13.3-1 Emergency Plan ITAAC

Planning Standard	EP ProgramElements	Inspections, Tests, Analyses	AcceptanceCriteria
1.0 Assignment ofResponsibility– OrganizationalControl			
10 CFR 50.47(b)(1) – Primary responsibilitiesfor emergency responseby the nuclearfacility licensee, andby State and local organizations within the EPZs have been assigned, the emergencyresponsibilitiesof the various supporting organizations have been specifically established, and each principle response organizationhasstaff to respond and to augment its initial response on a continuous basis.	1.1 The staff exists to provide 24-hour per day emergency response andmanning of communications links, including continuous operations for a protracted period. [A.1.e, A.4]** [**References in brackets throughout this table correspond towith NUREG_0654/FEMA-REP-1 EvaluationCriteria]	1.1 An inspection of the emergency planimplementingprocedureswill be performed.	1.1 Emergency plan implementing procedures provide for 24-hour per dayemergency responsestaffing and manning of communications links, includingcontinuous operations for a protractedperiod.
2.0 Onsite EmergencyOrganization			
10 CFR 50.47(b)(2) – On-shift facility licenseeresponsibilities for emergency response are unambiguously defined, adequate staffing to provideinitialfacility accident response in key functional areas is maintained at alltimes, timely augmentation of responsecapabilities is available, and the interfaces amongvarious onsite response activities and offsite support and response activities are specified.	2.1 The staff exists to provide minimum andaugmented on-shift staffing levels, consistent with Table B-1 of NUREG-0654/FEMA-REP-1,Rev.1. [B.5,B.7]	2.1 An inspection of the emergency planimplementingprocedureswill be performed.	2.1 Emergency plan implementing procedures provide minimum and augmented on-shift staffing levels, consistent with Table B-1of the Levy NuclearPlant Units 1& 2 Combined License (COL) ApplicationEmergency Plan.

Planning Standard	EP ProgramElements	Inspections, Tests, Analyses	AcceptanceCriteria
3.0 EmergencyClassification System			
10 CFR 50.47(b)(4) – A standard emergency classification and action levelscheme, the bases of which includefacility system and effluent parameters, is in use by the nuclear facility licensee,and State and local response plans call for relianceon information providedby facility licenseesfor determinations of minimuminitial offsite response measures.	3.1 A standard emergency classificationand emergency action level (EAL) scheme exists, and identifies facility system and effluent parameters constituting the bases for the classificationscheme.[D.2]	3.1 An inspection of the Control Rooms, Technical Support Centers (TSCs), and Emergency Operations Facility (EOF) willbe performedto verify that they havedisplays for retrieving facility system and effluent parameters are specified in the Emergency Classification and EAL scheme and the displays are functional.	3.1 The specified parameters are retrievable in the Control Rooms, TSC and EOF, andthe ranges of thedisplays encompass the values specified in the EmergencyClassification and EAL scheme.
4.0 Notification Methodsand Procedures			
10 CFR 50.47(b)(5) – Procedures have been established for notification, bythe licensee, of State and local response organizations and for notification of emergency personnel by all organizations; the content of initial and follow-upmessages 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.	<p>4.1 The means exists<u>means exist</u> to notify responsible State and local organizations within 15 minutes after the licensee declaresan emergency.[E.2]</p> <p>4.2 The means exists<u>means exist</u> to notify emergency response personnel. [E.1]</p>	<p>4.1 A test willbe performedto demonstratethe capabilitiesfor providinginitialnotificationto the offsite authorities after a simulated emergency classification.</p> <p>4.2 A test of the primary and back-up <u>Emergency Response Organization (ERO)</u> notification systems will be performed.</p>	<p>4.1 The State of Florida and the counties of Levy, Citrus,and Marion receive notification within 15 minutes after thedeclaration of an emergency from the control room and the EOF.</p> <p>4.2 The primary and back-up ERO notification system testsresultin:</p> <ul style="list-style-type: none"> • Emergency response personnel receiving the notification message; • Mobilizationcommunication is validated by personnel response to the notification system or by telephone; • Response to electronic notification and plant page system is accomplished during normalworking hours, and off hours.

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	4.3 The means exists <u>means exist</u> to notify and provide instructions to the populace within the plume exposure EPZ. [E.3]	4.3 The full test of notification capabilities will be conducted.	4.3 Notification and clear instructions to the public are successfully accomplished in accordance with the emergency plan requirements.
5.0 Emergency Communications			
10 CFR 50.47(b)(6) – Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.	<p>5.1 The means exists<u>means exist</u> for communications among the Control Rooms, TSCs, EOF, principal State and local emergency operations centers (EOCs), and radiological field assessment teams. [F3, F.5]</p> <p>5.2 The means exists<u>means exist</u> for communications from the Control Rooms, TSCs, and EOF to the NRC headquarters and regional office EOCs (including establishment of the Emergency Response Data System (ERDS) [or its successor system] between the on-site computer system and the NRC Operations Center.) [F.2.6]</p>	<p>5.1 A test will be performed of the capabilities. The test for the contact with the principal EOCs and the radiological field assessment teams will be from the Control Room and the EOF. The TSC communication with the Control Room and the EOF will be performed.</p> <p>5.2 A test is performed of the capabilities to communicate using ENS from each operating Control Room, TSC and EOF to the NRC headquarters and regional office EOCs. The Health Physics Network (HPN) is tested to ensure communications between the TSC and EOF with the NRC Operations Center. ERDS is established [or its successor system] between the on-site computer systems and the NRC Operations Center.</p>	<p>5.1 Communications (both primary and secondary methods/systems) are established between the Control Rooms, TSC and the EOF with Florida Division of Emergency Management (DEM) warning point and EOC; Levy County Warning Point and EOC; Citrus County Warning Point and EOC; and Marion County Warning Point and EOC. Communications are established between the Control Rooms, TSC and the EOF with the LNP radiological monitoring teams.</p> <p>5.2 Communications are established between the Control Rooms, TSC and EOF to the NRC headquarters and regional office EOCs utilizing the ENS. The TSC and EOF demonstrate communications with the NRC Operations Center using HPN. The access port for ERDS [or its successor system] is provided and successfully completes a transfer of data from the plant computer system to the NRC Operations Center.</p>

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6.0 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.	6.1 The licensee has provided space which may be used for a limited number of the news media. [H.1.5]	6.1 A test of the facility/area provides adequate equipment to support <u>Emergency News Center (ENC)</u> operation, including communications with the site and with the Emergency Operation Centers in the state and emergency planning zone (EPZ) counties.	6.1 The ENC includes equipment to support ENC operations, including communications with the EOF and State and EPZ County EOCs.
7.0 Emergency Facilities and Equipment			
10 CFR 50.47(b)(8) – Adequate emergency facilities and equipment to support the emergency response are provided and maintained.	7.1 The licensee has established a TSC and on-site <u>Operations Support Center (OSC)</u> . [The TSC and OSC may be combined at a single location.] [H.1.2, H.1.3, Annexes 1 and 2]	7.1.1 An inspection of the as-built TSCs and OSCs will be performed, including a test of the capabilities. These facilities will meet the criteria of NUREG-0696.	<p>7.1.1 Each TSC has at least 1875 ft² of floor space (75 ft² per person for a minimum of 25 persons).</p> <p>7.1.2 The TSC is close to the control room, and the walking distance from the TSC to the control room does not exceed two minutes.</p> <p>7.1.3 Communications equipment is installed, and voice transmission and reception are accomplished between the Control Rooms, TSC, OSCs, and EOF.</p>

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	7.2 The licensee has establishedanEOF. [H.1.4]	7.2 An inspection of the as-builtEOF willbe performed,includinga test of the capabilities.The EOF willmeet the criteria of NUREG-0696 and 0737.	<p>7.1.4 The TSC ventilationsystems include a high efficiency particulateair (HEPA), and charcoal filter and radiationmonitors are installed.</p> <p>7.1.5 The TSC receives, stores, processes, and displays plant and environmental information, and enables the initiationof emergency measures and the conduct of emergencyassessment. These capabilities are demonstratedduring testing and acceptance activities.</p> <p>7.1.6 There is an OSC located inside theUnit's Protected Area. It is separate from the Control Room and TSC within theProtected Area.</p> <p>7.1.7 Communications equipment is installed, and voice transmission and reception are accomplishedbetween the OSC andOSC Teams, the TSC, and Control Rooms.</p> <p>7.2.1 Communications equipment is installed and voice transmission and reception are accomplishedbetween the Control Rooms, TSC, EOF, radiological monitoring teams (RMTs), NRC, State and county agencies, and ENS.</p> <p>7.2.2 Radiological data, meteorologicaldata, and plant system data is acquired, displayed and evaluated pertinent to offsite protective measures in the EOF.</p> <p>7.2.3 The EOF is structurally built in accordancewith the Uniform BuildingCode.</p>

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			<p>7.2.4 The EOF is environmentallycontrolledto provideroomair temperature, humidity, and cleanliness appropriate for personnel and equipment.</p> <p>7.2.5 The EOF is providedwith industrial security whenit is activated to exclude unauthorizedpersonnel and when it is idle to maintainits readiness.</p>
	<p>7.3 The means-exists<u>means exist</u> to initiate emergency measures, consistent with Appendix1of NUREG-0654/FEMA-REP-1, Rev.1.[H.5]</p> <p>7.4 The means-exists<u>means exist</u> to acquire data from, orfor emergency access to, offsite monitoring and analysis equipment. [H.6]</p> <p>7.5 The means-exists<u>means exist</u> to provide offsite radiological monitoring equipment in the vicinity ofthe nuclearfacility.[H.7]</p> <p>7.6 The means-exists<u>means exist</u> to provide meteorological information, consistent with Appendix2of NUREG-0654/FEMA-REP-1, Rev.1.[H.8]</p>	<p>7.3 – 7.6 A test willbe performed of the capabilities.</p>	<p>7.3 The means-exists<u>means exist</u> to initiate emergency measures,consistent withAppendix1 of NUREG-0654/FEMA-REP-1, Rev.1. EALswill be classifiedwithin 15 minutes or less of initiatingcondition.</p> <p>7.4 The means-exists<u>means exist</u> to acquire data from, or for emergency access to, offsite monitoring and analysis equipment. EALs using offsite does-dose monitoring and analysis equipment will be madewithin 15 minutesof initiating conditions.</p> <p>7.5 The means-exists<u>means exist</u> to provide offsite radiologicalmonitoring equipment in the vicinity of LNP for environmental monitoring including radiological monitoring team dosimetry.</p> <p>7.6 The means-exists<u>means exist</u> to provide meteorological information,consistent with Appendix2 ofNUREG-0654/FEMA-REP-1, Rev. 1. LNP meteorological equipment willbe ableto assess and monitor actual or potential offsite consequences of a radiological condition related to atmospheric measurements.</p>

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8.0 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.	8.1 The means-exists <u>means exist</u> to provide initial and continuing radiological assessment throughout the course of an accident.[I, I.3]	8.1 A test will be performed to demonstrate that the means-exists <u>means exist</u> to provide initial and continuing radiological assessment throughout the course of an accident through the plant computer or communications with the Control Room.	<p>8.1 Using selected monitoring parameters, simulated degraded plant conditions are assessed, and protective actions are initiated in accordance with the following criteria:</p> <p>A. Accident Assessment and Classification</p> <p>1. Demonstrate the ability to identify initiating conditions, determine emergency action level (EAL)<u>emergency action level</u> parameters, and correctly classify the emergency throughout the drill.</p> <p>B. Radiological Assessment and Control</p> <p>1. Demonstrate the ability to obtain on-site radiological surveys and samples.</p> <p>2. Demonstrate the ability to continuously monitor and control radiation exposure to emergency workers.</p>

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	<p>8.2 The means-exists<u>means exist</u> 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]</p>	<p>8.2 A test will be performed to demonstrate that the means-exists<u>means exist</u> 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.</p>	<p>3. Demonstrate the ability to activate:</p> <p>a. One radiological monitoring team (2 personnel) within 30 minutes of event declaration and,</p> <p>b. A second radiological monitoring team (2 personnel) within 60 minutes of event declaration.</p> <p>4. Demonstrate the ability to satisfactorily collect and disseminate field team data.</p> <p>5. Demonstrate the ability to develop dose projections.</p> <p>6. Demonstrate the ability to make the decision whether to issue radioprotective drugs (KI) to emergency workers.</p> <p>7. Demonstrate the ability to develop appropriate protective action recommendations (PARs) and notify appropriate authorities within 15 minutes of development.</p> <p>8.2 Emergency plan implementing procedures provides sufficient direction to calculate the source terms and the magnitude of the release of postulated accident scenario releases.</p>

Planning Standard	EP ProgramElements	Inspections, Tests, Analyses	AcceptanceCriteria
	<p>8.3 The means-exists<u>means exist</u> 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]</p> <p>8.4 The means-exists<u>means exist</u> to acquire and evaluate meteorological information. [I.6]</p> <p>8.5 The means-exists<u>means exist</u> to determine the release rate and projected doses if the instrumentation used for assessment is off-scale or inoperable. [I.4]</p> <p>8.6 The means exist for field monitoring within the plume exposure EPZ. [I.7]</p>	<p>8.3 A test will be performed to demonstrate that the impact of a radiological release to the environment is able to be assessed by utilizing the relationship between effluent monitor readings, and onsite and offsite exposures and contamination for various meteorological conditions.</p> <p>8.4 A test will be performed to acquire and evaluate meteorological data/information.</p> <p>8.5 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.</p> <p>8.6 A test will be performed of the capabilities for field monitoring within the plume exposure EPZ.</p>	<p>8.3 Response personnel can 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.</p> <p>8.4 The following parameters are displayed in the Control Room, TSC and EOF:</p> <ul style="list-style-type: none"> • Windspeed (at 10m and 60m) • Wind direction (at 10m and 60m) • Delta-temperature (between 10m and 60m) • Ambient temperature (at 10m and 60m) • Dew point temperature (at 10m) • Precipitation (at 2m) <p>This data is in the format needed for the appropriate emergency plan implementing procedures.</p> <p>8.5 A drill or exercise is conducted that demonstrates the capability to determine the release rate and projected doses with the instrumentation used for assessment off-scale or inoperable.</p> <p>8.6 A drill or exercise is conducted that demonstrates the ability of the radiological monitoring teams to be dispatched and locate and monitor a radiological release within the plume exposure EPZ.</p>

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	<p>8.7 The means exists<u>means exist</u> to make rapid assessments of actual or potential magnitude and locations of radiological hazards through liquid or gaseous release pathways, including activation, notification means, field team composition, transportation, communication, monitoring equipment, and estimated deployment times.[I]</p> <p>8.8 The capability exists to detect and measure radioiodine concentrations in air in the plume exposure EPZ, as low as 10^{-7} $\mu\text{Ci/cc}$ (microcuries per cubic centimeter) under field conditions.[I.7.1]</p> <p>8.9 The means exists<u>means exist</u> to estimate integrated dose from the projected and actual dose rates, and for comparing these estimates with the EPA protective action guides (PAGs).[I.4]</p>	<p>8.7 A test will be performed of the capabilities to make rapid assessments of actual or potential magnitude and locations of an a radiological hazards through liquid or gaseous release pathways, including activation, notification means, field team composition, transportation, communication, monitoring equipment, and estimated deployment times.</p> <p>8.8 A test will be performed of the capabilities <u>to</u> detect and measure radioiodine concentrations in air in the plume exposure EPZ, as low as 10^{-7} $\mu\text{Ci/cc}$ (microcuries per cubic centimeter) under field conditions.</p> <p>8.9 A test will be performed of the capabilities to estimate integrated dose from the projected and actual dose rates, and for comparing these estimates with the EPA protective action guides <u>PAGs</u>.</p>	<p>8.7 A drill or exercise is conducted that demonstrates the capability to activate the radiological monitoring team(s). The team(s) demonstrates the capability to make rapid assessment of actual or potential magnitude and locations of any radiological hazards through simulated liquid or gaseous release pathways. A qualified radiological monitoring team is capable of being notified, activated, briefed and dispatched from the EOF during a radiological release scenario. The team demonstrates conformance with procedural guidance for team composition, use of monitoring equipment, communication from the field, and locating specific sampling locations.</p> <p>8.8 A drill or exercise is conducted that demonstrates the capability of a radiological monitoring team to be dispatched during a radiological release scenario and use sampling and detection equipment for air concentrations in the plume exposure EPZ, as low as 10^{-7} $\mu\text{Ci/cc}$.</p> <p>8.9 A drill or exercise is conducted that demonstrates the ability to estimate integrated dose from the dose assessment program and the radiological monitoring team reading during a radioactive release scenario for the following radioisotopes: Kr-88, Ru-106, I-131, I-132, I-133, I-134, I-135, Te-132, Xe-133, Xe-135, Cs-134, Cs-137, Ce-144. Results are compared with the PAGs.</p>

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
9.0 Protective Response			
10 CFR 50.47(b)(10) – A range of protective actions has been developed for the plume exposure EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure EPZ appropriate to the locale have been developed.	<p>9.1 The means exists <u>means exist</u> to warn and advise onsite individuals of an emergency, including those in areas controlled by the operator, including: [J.1.1]</p> <ol style="list-style-type: none"> 1. employees not having emergency assignments; 2. visitors; 3. contractor and construction personnel; and 4. Other other persons who may be in the public access areas, on or passing through the site, or within the owner controlled area. <p>9.2 The means exist to radiologically monitor people evacuated from the site. [K.4]</p>	<p>9.1 A test will be performed of the capabilities.</p> <p>9.2 A test will be performed of the capabilities.</p>	<p>9.1 The following objectives to warn and advise onsite individuals using the plant public address system are successfully satisfied during a drill or exercise:</p> <p>A. Demonstrate the ability to perform assembly and accountability for all onsite individuals, including those identified below, within 30 minutes of an emergency requiring protected area evacuation and accountability:</p> <ol style="list-style-type: none"> 1. non-essential employees; 2. visitors; 3. contractor and construction personnel. <p>B. Demonstrate the ability to warn and advise other personnel within the owner controlled area in a timely manner (about 15 minutes).</p> <p>C. Demonstrate the ability to perform site dismissal.</p> <p>9.2 A drill or exercise is conducted that demonstrates the capability to radiologically monitor people evacuated from the site. Equipment is available, and personnel have been assigned and trained to procedures that are approved and in place to accomplish this activity.</p>

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	9.3 The means exists <u>means exist</u> to notify and protect all segments of the transient and resident populations. [J.2.1]	9.3 A test will be performed of the capabilities.	9.3 A drill or exercise is conducted to demonstrate the capability of the Public Alert and Notification System to successfully initiate a broadcast message to notify and protect all segments of the transient and resident populations.
10.0 Radiological Exposure Control			
10 CFR 50.47(b)(11) – Means for controlling radiological exposures, in an emergency, are established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity PAGs.	<p>10.1 The means exists<u>means exist</u> to provide onsite radiation protection. [K.2]</p> <p>10.2 The means exists<u>means exist</u> to provide 24-hour-per-day capability to determine the doses received by emergency personnel and maintain dose records. [K.3]</p> <p>10.3 The means exists<u>means exist</u> to decontaminate relocated onsite and emergency personnel, including waste disposal. [K5.b, K.7]</p> <p>10.4 The means exists<u>means exist</u> to provide onsite and contamination control</p>	<p>10.1 An analysis of site procedures will be performed.</p> <p>10.2 An analysis of emergency plan implementing procedures will be performed.</p> <p>10.3 An analysis of emergency plan implementing procedures will be performed.</p> <p>10.4 An analysis of site procedures will be performed.</p>	<p>10. 1 Site Procedures provide the means for onsite radiation protection.</p> <p>10.2 Emergency plan implementing procedures provide the means for 24-hour per-day capability to determine the doses received by emergency personnel and maintain dose records.</p> <p>10.3 Emergency plan implementing procedures provide a means to decontaminate relocated onsite and emergency personnel, including waste disposal.</p> <p>10.4 Site procedures provide the means for onsite contamination control measures.</p>

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11.0 Medicaland Public Health Support			
10 CFR 50.47(b)(12) – Arrangements are made for medicalservices for contaminated, injured individuals.	<p>11.1 Arrangements have been implementedfor local and backup hospital and medical services having the capability for evaluationof radiation exposure anduptake. [L.1]</p> <p>11.2 The means exist for onsite first aidcapability.[L.2]</p> <p>11.3 Arrangements have been implementedfor transporting victims of radiological accidents, includingcontaminated injured individuals, from the site to offsite medicalsupportfacilities. [L.4]</p>	<p>11.1 An analysis of emergency plan implementingprocedureswillbe performed.</p> <p>11.2 An analysis of station procedures and emergency plan implementingprocedureswillbe performed.</p> <p>11.3 An analysis of emergency plan implementingprocedureswillbe performed.</p>	<p>11.1 Arrangements have been implemented for local and backup hospital and medicalservices havingthe capabilityfor evaluationof radiation exposure anduptake per Letter(s) of Agreement and emergency plan implementing procedures.</p> <p>11.2 The means exist for onsite first aid capability to include a designated first aid station, supplies and site medical response team perstation procedures and Emergency plan implementing procedures.</p> <p>11.3 Arrangements have been implemented for transporting victims of radiological accidents, includingcontaminated injured individuals, from the site to offsite medical support facilities per Letter(s)of Agreement and emergency plan implementing procedures.</p>

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12.0 Exercises and Drills			
10 CFR 50.47(b)(14) – Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.	12.1 Licensee conducts a full participation exercise to evaluate major portions of emergency response capabilities, which includes participation by each State and local agency within the plume exposure EPZ, and each State within the ingestion control EPZ. [N.1]	12.1 A full participation exercise (test) will be conducted within the specified time periods of Appendix E to 10 CFR Part 50.	<p>12.1.1 The exercise is completed within the specified time periods of Appendix E to 10 CFR Part 50, on-site exercise objectives listed below have been met, and there are no uncorrected on-site exercise deficiencies.</p> <p><i>A. Accident Assessment and Classification</i></p> <p>1. Demonstrate the ability to identify initiating conditions, determine emergency action level (EAL) parameters, and correctly classify the emergency throughout the exercise in accordance with emergency plan implementing procedures.</p> <p><u>Standard Criteria:</u></p> <p>a. The appropriate EAL condition associated with a parameter or symptom was recognized.</p> <p>b. The correct emergency classification is declared within 15 minutes of the time that the EAL condition was present.</p>

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			<p><i>B. Notifications</i></p> <p>1. Demonstrate the abilityto alert, notify and mobilizesiteemergency response personnel, in accordance with emergency plan implementingprocedures.</p> <p><u>StandardCriteria:</u></p> <ul style="list-style-type: none"> a. Initiate a plant page announcement using the appropriate messagescenario for ERO notification. b. Activate the computer based automated callout system at declaration of an Alert classificationor higher. <p>2. Demonstratethe abilityto notify responsible State and local government agencieswithin 15 minutes and the NRCwithin 60 minutes after declaring anemergency, in accordancewith emergency plan implementing procedures.</p> <p><u>StandardCriteria:</u></p> <ul style="list-style-type: none"> a. Transmit information to state and local agencies within 15 minutesof event classification. b. Transmit follow-up information to state and local agencies within 60 minutes of last transmittal.

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			<p>c. Transmit information within 60 minutes of event classification for an initial notification to the NRC.</p> <p>3. Demonstrate the ability to warn or advise onsite individuals of emergency conditions in a timely manner (about 15 minutes), in accordance with emergency plan implementing procedures.</p> <p><u>Standard Criteria:</u></p> <p>a. Initiate notification of onsite individuals of event declaration (via plant page, telephone, etc.)</p> <p>4. Demonstrate the capability of the Public Alert and Notification System to operate properly for public notification when required, in accordance with emergency plan implementing procedures.</p> <p><u>Standard Criteria:</u></p> <p>a. Greater than 94% of <u>Alert and Notification System (ANS)</u> sirens are capable of performing their function as indicated by the feedback system. The clarifying notes listed in NEI 99-02, Regulatory Assessment Performance Indicator Guideline, will be used for this test.</p>

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			<p><i>C. Emergency Response</i></p> <p>1. Demonstrate the capability to direct and control emergencyoperations,in accordance with emergency plan implementing procedures.</p> <p><u>StandardCriteria:</u></p> <p>a. Facility command and control is demonstratedby the Nuclear Shift Manager - Operations in the Control Room (simulator) upon event declaration, and by the Emergency Coordinator - TSC in the Technical Support Center (TSC) and the EOF Director in the Emergency Operations-Facility (EOF) within60 minutes of ERO notification.</p> <p>2. Demonstratethe abilityto transfer overall command and control fromthe NuclearShift Manager - Operations in the Control Room (simulator) to the Emergency Coordinator - TSC in the TSC and EOFDirector in the EOF, in accordance with emergency plan implementingprocedures.</p> <p><u>StandardCriteria:</u></p> <p>a. Evaluation of briefings that were conducted prior to turnover includes current plant conditions, radiological release information, response efforts andpriorities, and the formal relief of delegable and non-delegableresponsibilities.</p>

Planning Standard	EP ProgramElements	Inspections, Tests, Analyses	AcceptanceCriteria
			<p>3. Demonstrate the ability to maintain continuous staffing of the emergency response facilities for a protracted period, in accordance with emergency plan implementing procedures.</p> <p><u>Standard Criteria:</u></p> <p>a. Complete shift relief schedule adequate to support 24-hour staffing.</p> <p>4. Demonstrate the ability to perform assembly and accountability for all onsite individuals within 30 minutes of an emergency requiring a Protected Area evacuation and accountability, in accordance with emergency plan implementing procedures.</p> <p><u>Standard Criteria:</u></p> <p>a. All Protected Area personnel are assembled in their designated assembly area and accountability is completed within 30 minutes of an emergency requiring Protected Area evacuation and accountability.</p>

Planning Standard	EP ProgramElements	Inspections, Tests, Analyses	AcceptanceCriteria
			<p><i>D. Emergency ResponseFacilities</i></p> <p>1. Demonstrate activation of the Operations-Support Center (OSC), Technical Support Center (TSC), EmergencyOperations Facility (EOF), and Emergency NewsCenter (ENC), in accordancewith emergency plan implementing procedures.</p> <p><u>StandardCriteria:</u></p> <p>a. The TSC andOSC, are activated within approximately one (1) hour of an Alert or higher emergency declaration with at least minimumstaffing.</p> <p>b. The EOF is activated within approximately one (1) hourof a Site Area Emergency or higher emergency declaration with at least minimumstaffing.</p> <p>c. The ENC minimum staffingpositions are availablewithin approximately two (2) hours of a Site Area Emergency or higher emergency declaration.</p> <p>2. Demonstrate the adequacy of equipment, security provisions, and habitabilityprecautions for the TSC, OSC, EOF, and ENC, as appropriate, in accordancewith emergency plan implementing procedures.</p>

Planning Standard	EP ProgramElements	Inspections, Tests, Analyses	AcceptanceCriteria
			<p><u>StandardCriteria:</u></p> <ul style="list-style-type: none"> a. The adequacy of the emergency equipment in the emergencyresponsefacilities, including availability and consistency with emergency plan implementing procedures, supported theaccomplishment of all of the evaluated performance objectives. b. The Security Coordinator implements and performs all appropriate steps from the emergency plan implementing procedures for the ingress, egress, and control of onsite and offsite personnel responding to the site during the scenario. c. The Radiation ControlsCoordinator and staff correctly implement and perform all appropriate steps from the emergency plan implementingprocedureswhen a simulated onsite/offsite release has occurred during the scenario. d.Demonstratethe capabilityof TSC andEOF equipment and data displays to clearly identifyandreflect the affected unit. <p>3. Demonstrate communicationsfrom the emergencyresponse facilities and the adequacy of communications forall emergency support resources,in accordance with emergency plan implementing procedures.</p> <p><u>StandardCriteria:</u></p> <ul style="list-style-type: none"> a. Emergency response communications are availableandoperational.

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
			<p>b. Communication systems are adequate to support CR, TSC, OSC, EOF, and ENC activation.</p> <p>c. Demonstrate emergency response personnel are able to operate all specified communication systems.</p> <p>d. Clear primary and backup communications links are established and maintained for the duration of the exercise.</p> <p><i>E. Radiological Assessment and Control</i></p> <p>1. Demonstrate the ability to obtain on-site radiological surveys and samples.</p> <p><u>Standard Criteria:</u></p> <p>a. Radiation Protection (RP) personnel demonstrate the ability to obtain appropriate instruments (range and type) and take surveys for scenario conditions that allow EPAPAGs to be exceeded.</p> <p>b. Airborne samples are properly taken, reported and assessed and utilized when the conditions indicate the need for the information.</p> <p>2. Demonstrate the capability to establish emergency exposure guidelines consistent with EPA-400 and the ability to continuously monitor and control radiation exposure to emergency workers.</p>

Planning Standard	EP ProgramElements	Inspections, Tests, Analyses	AcceptanceCriteria
			<p><u>StandardCriteria:</u></p> <ul style="list-style-type: none"> a. Demonstratethe ability todetermine doses receivedby emergency personnel and volunteers 24hours/day and provisions for distribution ofboth self-reading and permanent record devices. b. Demonstratethat exposures arecontrolled to 10 CFR Part 20 limits until the Emergency Coordinator authorizes the use ofemergencyEPAlimits. c. Exposure records areavailable,eitherfrom the ALARA computer or ahardcopy dose report, and are updated and reviewed throughout the scenario. <p>3. Demonstrate the methods, equipment, and expertise availableto make rapid assessments of the actualor potential magnitude and locations of radiological hazards from both gaseous and liquid pathways.</p> <p><u>StandardCriteria:</u></p> <ul style="list-style-type: none"> a. One radiological monitoring team (2 personnel) isready to be deployed no later than 30 minutes from the declaration ofan Alert or higher emergency. b. A secondradiological monitoring team (2 personnel) isready to be deployed no later than 60 minutes from the declaration ofan Alert or higher emergency.

Planning Standard	EP ProgramElements	Inspections, Tests, Analyses	AcceptanceCriteria
			<p>4. Demonstrate the ability to satisfactorily collect and disseminate radiological monitoring team data.</p> <p><u>Standard Criteria:</u></p> <p>a. Offsite radiological environmental data collected is provided as dose rate and counts per minute (cpm) from the plume, both open and closed window, and air sample (gross and net cpm) for particulate and iodine, if applicable.</p> <p>b. Offsite radiological environmental data is communicated from the radiological monitoring team to the Radiation Control Coordinator.</p> <p>5. Demonstrate the ability to estimate integrated dose from projected and actual dose rates and to compare these estimates with EPA Protective Action Guidelines (PAGs).</p> <p><u>Standard Criteria:</u></p> <p>a. The Dose Projection Team Leader and Dose Projection Team perform dose projections in accordance with emergency plan implementing procedures, and report them to the Radiation Controls Manager.</p> <p>6. Demonstrate the availability and use of potassium iodide (KI) for onsite emergency response personnel.</p>

Planning Standard	EP ProgramElements	Inspections, Tests, Analyses	AcceptanceCriteria
			<p><u>StandardCriteria:</u></p> <p>a. KI is considered as a potential dose reducing option for situations where airborne radioactive iodineis present.</p> <p>b. KI was administeredforactivities where personnel dose to the thyroid was calculated, or estimated, tobe > 25 Rem <u>committed dose equivalent</u> (CDE).</p> <p>7. Demonstratetheabilityto recommend protective actions to appropriate offsite authorities, inaccordancewith emergency plan implementingprocedures.</p> <p><u>StandardCriteria:</u></p> <p>a. Total effective dose equivalent (TEDE)and committed dose equivalent(CDE) to the thyroid doseprojections from the dose assessment model are compared to the PAGs.</p> <p>b. PARsare developedwithin 15 minutes of the time informationof the condition warranting aPAR was available to the ERO.</p>

Planning Standard	EP ProgramElements	Inspections, Tests, Analyses	AcceptanceCriteria
			<p>c. PARsare transmitted within 15 minutes of development. Changes to recommendations are communicated to offsite authorities within 15 minutes of a newPAR.</p> <p><i>F. Public Information</i></p> <p>1. Demonstrate the capability to developand disseminate clear, accurate, and timely information to the news media, in accordance with emergency plan implementing procedures.</p> <p><u>StandardCriteria:</u></p> <p>a. Informationprovidedto themedia/publicis prepared at alevel that the publiccan understand. Visuals and handouts are provided as needed to clarify the information.</p> <p>b. Informationiscoordinated with Federal, State and localagencies to maintainfactual consistency.</p> <p>c. Mediabriefings are provided within approximately 60 minutesof significant events (i.e., declaration ofa Site Area Emergency or initiationof a radiological release.)</p>

Planning Standard	EP ProgramElements	Inspections, Tests, Analyses	AcceptanceCriteria
			<p>2. Demonstrate the capability to establish and effectively operate rumor control in a coordinated fashion, in accordance with emergency plan implementing procedures.</p> <p><u>StandardCriteria:</u></p> <ul style="list-style-type: none"> a. Calls are answered in a timely manner with the correct information. b. Calls are returned or forwarded, as appropriate, to demonstrate responsiveness. c. Rumors are identified and addressed, and recurring rumors are addressed in subsequent press briefings and news releases. <p><i>G. Recovery and Reentry</i></p> <p>1. Demonstrate the ability to enter recovery and reentry conditions, in accordance with emergency plan implementing procedures.</p> <p><u>StandardCriteria:</u></p> <ul style="list-style-type: none"> a. The appropriate EAL condition and emergency classification is downgraded to a lower classification or terminated. b. Proper notifications are made to onsite and offsite emergency response agencies, including State and local agencies.

Planning Standard	EP ProgramElements	Inspections, Tests, Analyses	AcceptanceCriteria
			<p><i>H. Evaluation</i></p> <p>1. Demonstratethe abilityto conducta post-exercisecritique, to determine areasrequiring improvement and corrective action, in accordancewith emergency plan implementing procedures.</p> <p><u>StandardCriteria:</u></p> <p>a. An exercise time line is developed, followed by an evaluation of the objectives against the expectations of the timeline.</p> <p>b. Significant problems in achievingthe objectives are discussed to ensure understanding of why objectives were not fully achieved.</p> <p>c. Areas requiring improvement are entered in the Levy CorrectiveActionProgram.</p>

Planning Standard	EP ProgramElements	Inspections, Tests, Analyses	AcceptanceCriteria
			<p>12.1.2 Onsiteemergency response personnel are mobilizedin sufficient numbersto fill emergency response positions and successfully perform assigned responsibilities (see Note 1).</p> <p>12.1.3 The exercisewas completed within the specified timeperiods of Appendix E to10 CFR Part 50, offsite exerciseobjectiveswere met, and there were no uncorrected offsite exercise deficiencies, or a licensesecondition requires offsite deficiencies to be corrected prior to operation above 5%of rated power as described in10 CFR 50.54(gg).</p> <p>(Note 1:Theassigned responsibilitiesfor onsite Emergency Response Organization members areidentifiedin Sections B.1 through B.7 of the Levy COL ApplicationEmergency Plan and Emergency PlanImplementing Procedures.)</p>
13.0 Radiological EmergencyResponse Training			
10 CFR 50.47(b)(15) – Radiologicalemergency response training is provided to those who may be called on to assistin an emergency.	13.1 Site-specific emergency response training has been provided for those who may be called upon to provide assistance in the event of an emergency.[O.1]	13.1 An inspection of the emergency response organization training programwillbe performed.	<p>13.1 Site-specific emergency response training has been provided for the:</p> <ul style="list-style-type: none"> •LNP emergency responseorganization, and •Offsite medical, locallawenforcement and firefighterpersonnel <p>that may be called upon to provide assistance in the event of an emergency as documented on training records.</p>

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
14.0 Responsibility for the Planning Effort: Development, Periodic Review, and Distribution of Emergency Plans			
10 CFR 50.47(b)(16) – Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.	14.1 The emergency response plans have been forwarded to all organizations and appropriate individuals with responsibility for implementation of the plans.[P.5]	14.1 An inspection of the distribution list will be performed.	14.1 The LNP emergency response plan was forwarded to Florida Emergency Management, Citrus County Emergency Management, Levy County Emergency Management and Marion County Emergency Management.
15.0 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.	15.1 The licensee has submitted detailed implementing procedures for its emergency plan no less than 180 days prior to fuel load.	15.1 An inspection of the submittal letter will be performed.	15.1 The Date-date of the submittal letter from the licensee demonstrates that the detailed implementing procedures for the onsite emergency plan were submitted no less than 180 days prior to fuel load.

