

## PMTurkeyCOLPEm Resource

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**From:** Comar, Manny  
**Sent:** Wednesday, April 29, 2015 11:46 AM  
**To:** TurkeyCOL Resource  
**Subject:** FW: New Evacuation Time Estimate study for Turkey Point  
**Importance:** High

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**From:** Musico, Bruce  
**Sent:** Wednesday, April 29, 2015 11:20 AM  
**To:** Jones, Joe A (jojones@sandia.gov)  
**Cc:** Barss, Dan; Thomas, Kenneth; Rivera, Alison; Murray, Charles; Comar, Manny; Williamson, Alicia  
**Subject:** FW: New Evacuation Time Estimate study for Turkey Point  
**Importance:** High

Joe,

We received two questions from South Miami Mayor Stoddard regarding the Turkey Point Nuclear Plant (PTN) site updated (Rev. 4) ETE, which are included in Mayor Stoddard's email below. They address both the application of NRC guidance in NUREG/CR-7002 to the PTN site, as well as the technical basis for specific guidance in NUREG/CR-7002. On their face, they appear to be valid questions, which merit a thorough (and prompt) response.

Please provide me with appropriate answers to Mayor Stoddard's thoughtful questions, including whether there is a need to approach the applicant (FP&L) via a request for additional information (RAI), and whether the technical basis for NUREG/CR-7002 needs to be re-evaluated. If these concerns necessitate changes to our ongoing evaluation of FPL's COLA for the proposed new Units 6 & 7, we will also need to consider any impact on the two existing Units 3 & 4 – since the ETE is applicable to the entire site (i.e., for all four nuclear units). I'm currently updated the ETE technical evaluation in the draft Safety Evaluation Report (SER) to reflect ETE Revision 4, such that resolution of this issue is important to its timely completion.

Of note, ETE (Revision 4) Table 1-1, "Stakeholder Interaction," addresses FPL's required (ETE-related) interactions with affected State and local governmental authorities, as required by 10 CFR Part 50, Section 50.47(b)(10), and Appendix E, Section IV.3. and IV.6. The entire, updated (Rev. 4) ETE is publically available at NRC's ADAMS Accession No. ML14311A289.

Let me know when you can respond, and your suggested path forward. If an RAI is needed, please send me a proposed draft as soon as possible. If there are contract-related aspects of this request, Dan can assist.

Thanks.  
Bruce

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**From:** Barss, Dan  
**Sent:** Wednesday, April 29, 2015 9:22 AM  
**To:** Thomas, Kenneth; Musico, Bruce  
**Cc:** Williamson, Alicia; Rivera, Alison; Murray, Charles; Comar, Manny; Barss, Dan  
**Subject:** RE: New Evacuation Time Estimate study for Turkey Point

My thoughts,

Generally we look for buy in on the ETE by State and local authorities by confirming that the licensee/applicant has coordinated with them in some manner in the development of the ETE. It is unusual for NRC to get direct comments from a State or local official on the ETE provided to the NRC.

Another thought, this ETE, if I remember correctly, is for all units at Turkey Point. Therefore, the Mayor's comments are on a document that is part of the EP for the operating units also. Therefore, resolution of the comments should include coordination with PM's for both the COL application and the operating units.

I will leave it to Bruce's judgement, we may need to get Joe Jones involved in responding to the comments.

Bruce, take the lead on this to appropriately address the Mayors comments.

Dan

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**From:** Thomas, Kenneth  
**Sent:** Wednesday, April 29, 2015 7:32 AM  
**To:** Musico, Bruce  
**Cc:** Barss, Dan; Williamson, Alicia  
**Subject:** FW: New Evacuation Time Estimate study for Turkey Point

Bruce,

Mayor Stoddard was able to read through the information and his comments are below. Yesterday, you and I discussed his comments he made at the G-2-G meetings and later at the public meeting for the Draft EIS.

Please let me know what you would like to do, if anything. I feel at least an acknowledgement of the mayor's input is in order, but correct me if I am wrong.

Thanks.

Best regards,

Kenny

Kenneth Thomas  
Emergency Preparedness Specialist  
U.S. Nuclear Regulatory Commission  
NSIR/DPR/NRLB

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**From:** Mayor Stoddard [<mailto:mayorstoddard@gmail.com>]  
**Sent:** Tuesday, April 28, 2015 6:13 PM  
**To:** Thomas, Kenneth  
**Cc:** Cindy Lerner; Daniella Levine Cava; Victoria Mendez; Matthew S. Haber  
**Subject:** Re: New Evacuation Time Estimate study for Turkey Point

Kenny,

Thanks. That worked.

My cursory review spotted two things of immediate concern regarding the new ETE study filed for TPN:

1. The new, updated ETE, like the old one, stops arbitrarily at SW 152nd Street, cutting two miles off the top off the 15-mile radius circle of the shadow evacuation zone recommended in NUREG/CR-7002. The excluded area, extending 30 blocks north to SW 122nd St, is the most densely populated part of the circle. No basis for this arbitrary cut-off is provided in the ETE, which states that it follows the recommendations in NUREG/CR-7002. Thus the area recommended for inclusion in evacuation time estimates does not appear to meet the NRC standards.

2. NUREG/CR-7002 itself provides no sound, quantitative basis for the arbitrary 15 mile shadow radius. To the contrary, it states:

**"General and site specific assumptions should be provided to support the analysis. Assumptions must be technically sound, be quantified when possible (NRC, 2005a), and have a basis."**

The 15 mile radius is listed as a "general" and "appropriate" assumption in Table 1-2 with no "technically sound" or "quantified" or "site specific" basis. The guidance indicates the assumptions should be both site specific and general. Further, no science is cited to justify the site-specificity of a 15 mile radius for the population of Miami-Dade County. Having lived through TMI, I know that if Americans have reason to believe the wind is blowing their way following a radiation release, many living as far as 150 miles away will choose to evacuate - that's ten times farther than the "general" assumption in the NRC guidance. I also remember that the US government recommended evacuation by American Citizens living within 50 miles of Fukushima.

I would be interested in your evaluation of my concerns.

Accuracy of the ETE takes on particular importance given the limited transportation options that exist when one attempts to evacuate a peninsula.

I have copied some of my colleagues who were at the Gov-to-Gov meetings last week.

thank you,

Philip

On Apr 28, 2015, at 7:25 AM, Thomas, Kenneth <[Kenneth.Thomas@nrc.gov](mailto:Kenneth.Thomas@nrc.gov)> wrote:

Dear Dr. Stoddard,

I have tried to email you the documents, but because they are large files, over 10MB each, they will not be able to be sent through email.

Perhaps these links will get you to the documents without much fuss.

ETE: <http://pbadupws.nrc.gov/docs/ML1431/ML14311A289.pdf>

Emergency Plan: <http://pbadupws.nrc.gov/docs/ML1431/ML14311A288.pdf>

The entire public submittal: <http://pbadupws.nrc.gov/docs/ML1431/ML14311A299.html>

Thank you for your patience.

Best regards,

Kenny

Kenneth Thomas  
Emergency Preparedness Specialist  
U.S. Nuclear Regulatory Commission

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