



June 12, 2015

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10 CFR 50.90

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

Point Beach Nuclear Plant, Units 1 and 2  
Dockets 50-266 and 50-301  
Renewed License Nos. DPR-24 and DPR-27

License Amendment Request 277, Revision to Staff Augmentation Times in the  
Point Beach Nuclear Plant Emergency Plan

In accordance with 10 CFR 50.90, NextEra Energy Point Beach, LLC (NextEra) hereby requests an amendment to Renewed Facility Operating Licenses DPR-24 and DPR-27 for the Point Beach Nuclear Plant (PBNP) Units 1 and 2, respectively. NextEra proposes to revise the Point Beach Emergency Plan, to increase the staff augmentation times for Emergency Response Organization (ERO) response functions. Additional changes include relocation of the Emergency Director and Emergency Action Level Monitor positions, and the addition of an Assistant Emergency Operations Facility Manager position.

Enclosure 1 provides a detailed description and analysis of the proposed changes. Attachment 1 to Enclosure 1 provides the annotated Emergency Plan pages showing the proposed changes. Attachment 2 to Enclosure 1 provides the clean Emergency Plan pages showing the proposed changes. Attachment 3 to Enclosure 1 provides the summary of ERO position changes. Enclosure 2 provides a comparison between NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Revision 1, the 1983 NRC approved Emergency Plan, the current Emergency Plan, and the proposed changes to the Emergency Plan.

Approval of the proposed amendment is requested by June 12, 2016.

NextEra has evaluated the proposed amendment and has determined that it does not involve a significant hazards consideration pursuant to 10 CFR 50.92. The proposed Emergency Plan changes have been reviewed by the Plant Operations Review Committee.

In accordance with 10 CFR 50.91, a copy of this letter is being provided to the designated Wisconsin Official.

Should you have any questions regarding this submittal, please contact Mr. Michael Millen, Licensing Manager, at 920-755-7845.

This letter contains one new regulatory commitment:

The increased staff augmentation times for the revised emergency response organization response functions will be implemented within 180 days of Commission Approval.

I declare under penalty of perjury that the foregoing is true and correct.  
June 12, 2015

Very truly yours,

NextEra Energy Point Beach, LLC



Eric McCartney  
Site Vice President

Enclosures

cc: Administrator, Region III, USNRC  
Project Manager, Point Beach Nuclear Plant, USNRC  
Resident Inspector, Point Beach Nuclear Plant, USNRC  
PSCW

## **ENCLOSURE 1**

### **NEXTERA ENERGY POINT BEACH, LLC POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2**

#### **LICENSE AMENDMENT REQUEST 277**

- 1.0 SUMMARY DESCRIPTION
- 2.0 DETAILED DESCRIPTION
  - 2.1 Proposed Changes
  - 2.2 Reason for the Proposed Changes
  - 2.3 PBNP Emergency Plan Background
- 3.0 TECHNICAL EVALUATION
  - 3.1 Technical Analysis
  - 3.2 Functional Analysis
  - 3.3 Conclusions
- 4.0 REGULATORY EVALUATION
  - 4.1 Applicable Regulatory Requirements/Criteria
  - 4.2 Precedent
  - 4.3 No Significant Hazards Consideration Determination
  - 4.4 Conclusions
- 5.0 ENVIRONMENTAL CONSIDERATION
- 6.0 REFERENCES

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#### **ATTACHMENTS:**

- 1. Proposed Emergency Plan Changes (Mark-up)
- 2. Proposed Emergency Plan Changes (Clean)
- 3. Summary of ERO Position Changes

## 1.0 SUMMARY DESCRIPTION

NextEra Energy Point Beach, LLC (NextEra) proposes revisions to the Point Beach Nuclear Plant (PBNP) Units 1 and 2, Emergency Plan. Point Beach Nuclear Plant completed a new staffing analysis of on-shift responsibilities resulting from impacts associated with the proposed changes. Additionally, a functional analysis of the augmented Emergency Response Organization (ERO) positions based on an extended augmentation time and completion of Major Tasks as outlined in NUREG-0654/FEMA-REP-1, Revision 1, was completed. The analyses determined that changes can be made to increase the staff augmentation times for ERO response functions from 30 and 60 minutes to 60 and 90 minutes, while maintaining the site's ability to protect public health and safety. Additional changes include relocation of the Emergency Director (ED) and the Emergency Action Level (EAL) Monitor positions from the Emergency Operations Facility (EOF) to the Technical Support Center (TSC) to support transfer of the classification function from the on-shift staff to the TSC within 60 minutes after the event and the addition of an Assistant EOF Manager position to perform facility oversight and to support notification and protective action recommendations.

The increase in the Emergency Response Organization (ERO) augmentation times results in an increase in facility activation times for the PBNP Emergency Response Facilities (ERF's). Therefore, the changes in staff augmentation response times are considered a reduction in Emergency Plan effectiveness as defined in 10 CFR 50.54(q)(1)(iv). In accordance with 10 CFR 50.54(q)(4), changes to a licensee's emergency plan that reduce the effectiveness of the plan may not be implemented without prior Nuclear Regulatory Commission (NRC) approval and are submitted as license amendment requests (LAR) in accordance with 10 CFR 50.90.

A table summarizing current emergency response position and functions compared to the proposed changes is included as Attachment 3 of this Enclosure. The changes identified in the table do not reflect a re-design of the ERO, but only necessary reassignment of responsibilities based on the results of the functional analysis.

## 2.0 DETAILED DESCRIPTION

### 2.1 Proposed Changes

Brief descriptions of the associated Emergency Plan proposed changes are provided below. The justification for each change is discussed in Section 3.2. For purposes of this submittal, activation of emergency response facilities (ERF's) is required within 60 minutes for the TSC and 90 minutes for the EOF of declaration of an event of an Alert or higher classification. Facilities are considered activated when minimum staffing is achieved and that facility is ready to accept specific command and control functions. The specific wording changes are provided in Attachments 1 and 2 to this enclosure as marked-up and clean copy Emergency Plan pages, respectively.

- a. Appendix A, "Emergency Response Organization Personnel Function and Responsibilities," Section 2.0, adds the new ERO position of Assistant EOF Manager and delineates the responsibilities of that position associated with EOF command and control, state/local notifications and offsite interfaces.

- b. Appendix A, "Emergency Response Organization Personnel Function and Responsibilities," Section 9.0, removed responsibility for filling out the Nuclear Accident Reporting System (NARS) form for state/local notifications from the EAL Monitor as this responsibility would be reassigned to the new position of Assistant EOF Manager as depicted in Section 2.0.
- c. Appendix A, "Emergency Response Organization Personnel Function and Responsibilities," Section 11.0, the Emergency Director position was relocated to Section 40.0.
- d. Appendix A, "Emergency Response Organization Personnel Function and Responsibilities," Section 14.1.2, was rewritten to identify new responsibilities assigned to the EOF Manager which were previously held by the Emergency Director when that position was in the EOF. This section also depicts the relocation of some EOF Manager duties from section 14.0 that are now assigned to the new Assistant EOF Manager position in Section 2.0.
- e. Appendix A, "Emergency Response Organization Personnel Function and Responsibilities," Section 40.0, includes the new title of Emergency Director and responsibilities for classification and onsite protective actions which will be completed from the TSC based on the revision to the ERO.
- f. Appendix A, "Emergency Response Organization Personnel Function and Responsibilities," Section 41.0 describes the responsibilities of the TSC Manager as were previously described in Section 40.1.2, 40.1.3 and 40.1.4.
- g. Appendix A, "Emergency Response Organization Personnel Function and Responsibilities," miscellaneous section changes include renumbering of procedure steps based on the addition of the new positions and updated references in principal working relationships resulting from the organizational changes.
- h. EP 5.0, "Organizational Control of Emergencies," Section 3.0, paragraph 7 contains updated titles associated with the changes identified in Appendix A.
- i. EP 5.0, "Organizational Control of Emergencies," Section 3.0, paragraph 8 includes the change in augmentation times for the TSC, Operations Support Center (OSC) and Offsite Radiation Protection Facility (OSRPF) from 30 minutes to 60 minutes as well as the change in augmentation times for EOF positions from 60 minutes to 90 minutes.
- j. EP 5.0, "Organizational Control of Emergencies," Section 3.2 has been revised to describe responsibilities for classification in the TSC by the Emergency Director. The description of the TSC Manager recommendations for classifications to the ED in the EOF has been deleted.

- k. EP 5.0, "Organizational Control of Emergencies," Section 3.3, paragraph 2 has been revised to reflect that the EOF Manager will assume responsibility for the emergency response and recovery EOF. This responsibility was previously assigned to the Emergency Director in the EOF.
- l. EP 5.0, "Organizational Control of Emergencies," Section 3.3, paragraph 3 has been revised to reflect responsibilities for notification and protective action recommendations in the EOF and removal of the responsibility for classification assessment and evaluation which has been transferred to the TSC in accordance with the changes described in Appendix A.
- m. EP 5.0, "Organizational Control of Emergencies," Section 4.1 has been changed to reflect the EOF Manager as the individual responsible for identification of situations where additional assistance is needed. This responsibility was previously assigned to the Emergency Director in the EOF.
- n. EP 5.0, "Organizational Control of Emergencies," Table 5.1, "Minimum Staffing for Emergencies," has been revised to reflect:
  - the changes from 30 and 60 minute augmentation to 60 and 90 minute augmentation
  - relocation of the Emergency Director position from the EOF to the TSC
  - the addition of an Assistant EOF Manager and EAL Monitor position to the augmentation table
- o. EP 5.0, "Organizational Control of Emergencies," Figure 5-3, "Technical Support Center (TSC) and Operations Support Center (OSC)," has been revised to reflect the addition of the Emergency Director position and the EAL Monitor to the TSC organization.
- p. EP 5.0, "Organizational Control of Emergencies," Figure 5-4, "Emergency Operations Facility (EOF) and Offsite Radiation Protection Facility (OSRPF)," has been revised to reflect:
  - The title change from Emergency Director to Emergency Manager EOF
  - The addition of the Assistant EOF Manager position
  - Removal of the EAL Monitor position from the EOF in accordance with the change cited in Figure 5-3.
- q. EP 6.0, "Emergency Measures," Section 4.0, has been revised to reflect the title changes for the Emergency Director and Assistant EOF Manager.
- r. EP 7.0, "Emergency Facilities and Equipment," Section 2.0 has been revised to reflect the title changes for the Emergency Director. These changes are acceptable as they align organizational changes and position titles as outlined in Appendix A.

## 2.2 Reason for the Proposed Changes

The proposed change is needed to address concerns regarding limitations on the number of ERO staff augmentation personnel available to respond to the site within 30 minutes. Significant increases in the number of ERO positions have occurred over the past several years. These changes require utilization of additional site personnel. Expanding augmentation times will increase the number of eligible plant personnel available to fill critical ERO positions and add valuable expertise. The proposed change does not reduce the number of personnel expected to respond and will not be applied as permission to delay response to an event.

The last PBNP Emergency Plan reviewed and approved by the NRC was Revision 20. This revision was approved by NRC Safety Evaluation Report (SER) dated June 10, 1983. The SER approved a configuration of PBNP on-shift and shift augmentation requirements. As approved by NRC, the PBNP Emergency Plan contained 30 minute augmentation time goals and met the intent of the guidance of NUREG-0654, Revision 1. The Emergency Plan provided the site commitment to meet the guidance for on-shift staffing and augmentation goals including 30 minute and 60 minute responders established in Table B-1 of NUREG-0654, Revision 1. Revision 20 of the PBNP Emergency Plan activation of the TSC and selected EOF positions occurred at the Alert classification with additional EOF, OSC, Corporate and Joint Public Information Center (JPIC) personnel responding at increasing levels of classification. Although activation of the EOF is not required until a Site Area Emergency or higher classification per NUREG-0654 Revision 1 and Revision 20 of the PBNP Emergency Plan, today, all ERF's are activated at the Alert or higher classification.

The ERO in Revision 20 of the Emergency Plan consisted of 25 positions which were augmented to support site response to an emergency. There were 2 individuals qualified to fill each position at that time, making the ERO a total of 50 individuals. Today, the ERO consists of 56 positions which are filled by personnel assigned to one of four ERO teams. This represents a 400% increase in the number of individuals required in order to meet existing Emergency Plan requirements.

Maintaining an appropriate number of on-shift personnel, crediting additional on-shift staff positions, technological advances available for on-shift responders and changing the augmentation time to 60 minutes and 90 minutes is a practical and prudent alternate method to ensure effective and timely emergency response augmentation.

Details associated with the on-shift ERO, revised augmented ERO and revised key responsibilities and task as identified in NUREG-0654 Revision 1, are included in Section 3.2 and Attachment 3 of this enclosure.

## 2.3 PBNP Emergency Plan Background

Point Beach Nuclear Plant is a two unit plant located in east central Wisconsin on the west shore of Lake Michigan about 30 miles south east of Green Bay and about 90 miles north northeast of Milwaukee. The facility is owned and operated by NextEra Energy Point Beach, LLC, an indirect wholly-owned subsidiary of FPL Energy, LLC (FPLE). Each unit at PBNP employs a two-loop pressurized water reactor designed and supplied by Westinghouse Electric Corporation. The initial PBNP application for a Construction Permit and Operating License was submitted to the Atomic Energy Commission (AEC) in July 1966. The Final Facility Description Safety Analysis Report (FFDSAR) was submitted for application of an Operating License in March 1969. Unit 1 began commercial operation in December 1970 and Unit 2 began commercial operation in October 1972.

Point Beach Nuclear Plant was designed and constructed to comply with the licensee's understanding of the intent of the AEC General Design Criteria (GDC) for Nuclear Power Plant Construction Permits, as proposed on July 10, 1967. PBNP was not licensed to NUREG-0800, "Standard Review Plan (SRP)." Point Beach Nuclear Plant has five ERF's augmenting the on-shift staff: the TSC, the OSC, the EOF, the OSRPF and the Joint Public Information Center (JPIC). During an emergency, the Shift Manager initially assumes the responsibility as ED. Emergency response by on-shift staff is directed by the ED from the Control Room (CR) until relieved by an augmenting staff with the subsequent activation of ERF's.

Point Beach Nuclear Plant uses four standard levels of emergency classification as described in NUREG-0654, Revision 1. Augmentation of the on-shift staff for an Unusual Event is optional and is left to the discretion of the ED. At the Alert or higher emergency classification levels, all of the ERF's are activated. The associated augmenting personnel are notified to report to their assigned facilities. A facility is declared 'activated' by its respective manager once minimum required staffing has been achieved such that the facility is capable of performing its assigned functions. The time from emergency declaration (from a classification of Alert or higher) to the time the facility is activated is the "augmentation time" for emergency responders.

The current revision of the Emergency Plan incorporates modifications made pursuant to the provisions of 10 CFR 50.54(q) including the revisions based on the staffing analyses performed to show compliance with the Enhanced Emergency Preparedness Rule Making published in the Federal Register on November 23, 2011.



## 3.0 TECHNICAL EVALUATION

### 3.1 Technical Analysis

The following section discusses technical changes completed in plant systems, dose assessment, procedures and training which have been completed in order to better support on-shift functions and ease operator burden. Additional information regarding on-shift and augmented positions and their responsibilities as identified in NUREG-0654/FEMA REP-1, Revision 1 are outlined in Attachment 3 of this enclosure. An on-shift analysis utilizing NEI 10-05, Assessment of On-Shift Emergency Response Organization Staffing and Capabilities, methodology was completed to determine whether an extension of augmentation staffing times impacted the on-shift staff. The analysis and results are included in Enclosure 3 of this submittal.

#### 3.1.1 Plant Computer System

At the time of the PBNP Emergency Plan Revision 20 approval, the site utilized a P250 plant system interface computer. The operator interface consisted of a small number of printers located in the control room and computer room.

In 1986, the P250 system was upgraded to a Combustion Engineering (CE) supplied Plant Process Computer System (PPCS). The design criteria for the 1986 PPCS were based on the requirements of NUREG-0737, Supplement 1, regarding the need for a Safety Parameter Display System (SPDS) and the upgrading of ERF's. The requirements specified for the SPDS were met or exceeded by a system of displays provided by PPCS. The parameters on the SPDS displays were provided by the Safety Assessment System (SAS) software. The system upgrade included introduction of automatic updates to plant overview and system displays on the computer monitors, consolidated safety parameter displays and increased frequency of parameter updates.

In 2002, the site installed the Westinghouse PPCS 2000. The number of plant operating parameters available on this system is larger due to the ability for the PPCS 2000 to communicate with another plant data acquisition system (equipment YR-4111) used on the secondary side of the plant.

Benefits of the upgraded systems include:

- Programming capability for automated response such as indication of critical parameter alarms,
- Improved plant monitoring capability for Emergency Director functions,
- Fewer keystrokes required to switch between graphical displays,
- Real time plant data available through graphical displays,
- PPCS functions are available to any desktop computer through the plant's site-wide internet.

The PPCS basic functions are supported by instrument buses with back-up power provided by vital buses.

### 3.1.2 Dose Assessment

Specifically designed displays have been developed for obtaining the necessary plant, radiological effluent, area radiation monitor, and meteorological information that is used by Operations personnel through the Unified RASCAL Interface (URI) program. The URI program has a rapid dose assessment option provided specifically for use by the Operations personnel and requires minimal data input.

#### 3.1.2.1 Previous On-Shift Dose Assessment

The 1982 dose assessment software, Meteorological and Dose Assessment, used manual entry of basic meteorological data and either manual entry of radiological data or use of internally stored source terms.

In March 1988, an upgrade to the Meteorological and Dose Assessment program was installed on the plant process computer system to facilitate prompt initial emergency classification by operating personnel. This dose assessment software was replaced by the Wisconsin Electric Dose Assessment Program (WEDAP) in 2003. The WEDAP program was based on the NRC RASCAL dose assessment program and used a Graphic User Interface (GUI) to facilitate user data entry needs.

#### 3.1.2.2 Current On-Shift Dose Assessment

Improvements have been made to the dose assessment program resulting in minimal user interface to produce results quickly. Radiological dose assessment has benefited from technological advances that make its use simpler and less time consuming. Dose assessment is currently performed by on-shift Operations personnel using the URI program which uses the NRC RASCAL program with a custom interface. The URI program greatly reduces the data entry needs and the number of program windows the user needs to access to perform a dose projection. It also incorporates a special option which allows CR personnel to perform dose assessments more rapidly than the previous software such that they can accomplish this task in a matter of minutes. With the use of the dose assessment program, as well as plant status, meteorological, and radiation monitoring data, one person can perform dose assessments during emergency conditions more efficiently than was able to be performed previously.

### 3.1.3 Automated Call-Out Systems

Enhancements in automated call-out and paging systems have resulted in streamlined processes for activation of the ERO. A single phone call initiates rapid notification of ERO members in lieu of individual calls to fill the 56 positions included in today's Emergency Plan. The system includes a primary activation location as well as a remotely located back-up capability to ensure uninterrupted operation.

### 3.1.4 Procedure Improvements

#### 3.1.4.1 Emergency Operating Procedures (EOPs)

Since the original emergency plan approval, Emergency Operating Procedures (EOPs) have been improved through industry initiatives. The EOPs now use a symptom-based approach that demands less assessment and interpretation of plant conditions by the operating crews. The EOPs interface well with new technology such as Plant Process Computer System (PPCS) Plant Information (PI). Parametric trend curves are generated by PPCS PI to graphically display plant conditions relative to limits or required actions.

#### 3.1.4.2 Emergency Plan Implementing Procedures (EPIPs)

In 2004, PBNP updated the emergency classification methodology to NEI 99-01, "Methodology for Development of Emergency Action Levels," Revision 4. PBNP EALs now incorporate guidance that has simplified the classification process, including the use of an overview matrix of EAL initiating conditions and threshold values that streamlines the process of evaluating EALs against plant conditions in the applicable EPIPs.

### 3.1.5 Training Improvements

#### 3.1.5.1 Operations Training

Training is used to strategically drive improved performance at PBNP. Since NRC approval of the PBNP Emergency Plan, the application of the Systematic Approach to Training (SAT) has resulted in developing a task list for Operations personnel. The SAT process ensures training is conducted to industry-accepted standards and has led to accreditation of the Operations Training Programs by the National Academy for Nuclear Training.

A dynamic simulator is routinely used during Operations Training. "As found" simulator evaluations that include emergency response scenarios, several of which are 90 minutes or greater in length, are part of the requalification cycle. Simulator scenarios are designed to be realistic and reflect a wide range of plant conditions, including emergency conditions. During evaluated simulator sessions, the control room staff is taken from normal

operation to accident conditions resulting in classification of at least one event, which can range from Unusual Event up to a General Emergency. The crew performs critical tasks, classification, accident mitigation, response prioritization, and communications without augmentation from additional responders. The proficiency of the control room staff to perform these functions while maintaining situational awareness, without additional support is assessed during every training cycle.

The Licensed Operator Requal (LOR) Training Program includes licensed crew evaluations that are to consider the scenario guidance attributes of National Academy for Nuclear Training, Academy Document (ACAD) 07-001, "Guidelines for the Continuing Training of Licensed Personnel."

ACAD 07-001 also provides guidance on the realistic integration of the emergency response into crew performance evaluations. The purpose is to ensure the additional challenges the emergency plan responsibilities add to the crew's ability to manage an event are realistically represented in the crew performance evaluations. Representing the event as realistically as possible, which includes the additional challenges of emergency plan responsibilities; helps promote the situational awareness necessary during a real event.

#### 3.1.5.2 Shift Technical Advisor (STA) Training

The STA was originally trained as an advisor to the operating shift per NUREG-0737. In 1990, additional guidelines were developed by INPO for the training of STAs. This is detailed in INPO 90-003, "Guidelines for Training and Qualifications of Shift Technical Advisors."

The INPO guidelines describe the role of the STA and is reflected in Operation Department procedure, OM 2.18, "Shift Technical Advisor." The STA performs independent assessments of plant operating concerns, technical support, appropriate corrective actions, analysis of events and their effects, effectiveness of response(s) to emergent conditions, classifications of emergencies, development of recommendations to protect the public and any other actions related to critical safety functions and plant safety during abnormal and emergency situations. By routine monitoring of equipment and plant operations, the STA can focus on preventive actions in order to mitigate the consequences of an accident and protect public health and safety.

#### 3.1.6 Increases in On-Shift Staffing

There has been an increase in on-shift staffing from what was required in Revision 20 of the PBNP Emergency Plan in order to ensure adequate performance of the major emergency plan functions and tasks. A total of 18 persons are identified for on-shift staffing which is an increase from the regulatory guidance provided by NUREG-0654 Revision 1 total of

10 persons. A comparative chart depicting on-shift and augmented staffing based on NUREG-0654 Revision 1, Revision 20 of the PBNP Emergency Plan, the current Emergency Plan and proposed revisions is included in Enclosure 2.

#### 3.1.7 Improvement Summary

The improvements to staffing, equipment, procedures and training that have occurred since initial approval of the PBNP Emergency Plan have resulted in a significant increase in the on-shift capabilities and knowledge. Based on these improvements, it is concluded that there would be no significant degradation or loss of any functional task as a result of the proposed augmentation times.

### 3.2 Functional Analysis

This analysis evaluates the impact of extending the augmentation times on the ability of the on-shift staff to perform the major tasks for the major functional areas of the PBNP Emergency Plan. The analysis demonstrates that no degradation or loss of function would occur as a result of the change.

Additional personnel have been included in the existing on-shift complement for a total on-shift staffing of 18 personnel. This represents an increase of eight (8) when compared to the regulatory guidance stated in NUREG-0654 Revision 1, Table B-1 and an increase of three (3) when compared to Revision 20 of the PBNP Emergency Plan.

The following is the result of the functional analysis performed for the areas as described in NUREG-0654 Revision 1, Table B-1.

#### 3.2.1 Plant Operations and Assessment of Operational Aspects

NUREG-0654 Revision 1 assumes the on-shift staff will provide these functions throughout the emergency. Compared to the original plan, the current plan has one additional Control Room Operator (CRO) and one Auxiliary Operator (AO) to support this function and to support tasks such as repair and corrective actions or operational accident assessments. Also, included in the current plan is the designation of a State/local Communicator that is a dedicated Security Shift Supervisor who completes initial notifications to offsite agencies. This improves availability of Operations personnel to perform specified functions.

In accordance with the current PBNP Emergency Plan, the on-shift staffing is in excess of the requirements of NUREG-0654 Revision 1 Table B-1, as well as that prescribed in Revision 20 of the PBNP Emergency Plan. The additional on-shift staff helps to ensure prompt response to emergency events without requiring immediate augmentation.

Therefore, the proposed increase in augmentation times will not detract from the capability of on-shift personnel to support plant operations or the assessment of operational aspects at the start of an event and until the on-shift staff is properly augmented.

### 3.2.2 Emergency Direction and Control

NUREG-0654 Revision 1 guidance indicates that the Shift Manager assumes this function as a collateral duty, where responsibility for overall direction of facility response may be transferred when ERF's are fully staffed.

According to the Revision 20 of the PBNP Emergency Plan, the Shift Superintendent would be responsible for emergency response efforts until relieved by the Duty and Call Superintendent (DCS) who arrived in the TSC within 30 minutes of notification of an event and would share responsibility for event response with the Shift Superintendent until the TSC was activated. After TSC activation, the DCS would assume responsibility for event response as the Plant Operations Manager in the TSC and would maintain that responsibility until relieved by the Site Manager in the EOF. Revision 20 of the PBNP Emergency Plan did not include facility activation criteria.

In the current revision of the Emergency Plan, the Shift Manager orders activation of the TSC, OSC, EOF, OSRPF, and JPIC in the event of an Alert or higher classification level. The goal is to accomplish augmentation of the TSC Manager, Rad/Chem Coordinator, I&C Leader, Mechanical/Electrical Leader, Chemist and Dose/PAR Coordinator within 30 minutes with additional ERO personnel in place such that activation of the TSC and EOF occur within 1 hour.

In the proposed PBNP Emergency Plan, a new TSC position, the ED, has been added to PBNP Emergency Plan 5.0, Table 5-1 to reflect the practice described in the text of the plan.

With the proposed changes, the ED position will be moved to the TSC and will maintain a 60 minute augmentation time. The Shift Manager (acting ED) is relieved by the ED in the TSC who then assumes overall control of the response efforts and responsibility for the emergency response functions of classification, notification, dose assessment, and protective action recommendations. As described earlier, the advances in technology, training and procedures as well as the additional on-shift Operations personnel adequately compensate for any additional burden imposed on the Shift Manager by the retention of the ED function for an additional 30 minutes.

Additionally, the EAL Monitor position is being relocated from the EOF to the TSC with a 60 minute augmentation time in order to further support transfer of classification responsibilities from the Control Room. The EOF is activated at an Alert classification to ensure timely mobilization of EOF personnel, including the EOF Manager. There is minimal potential impact to the ED because the EOF provides timely relief to the ED by assuming

the offsite responsibilities of notification, dose assessment and protective action recommendations after the EOF is activated which would occur within 90 minutes of event classification.

Finally, the proposed revision to PBNP Emergency Plan 5.0, Table 5.1, requires augmentation of the on-shift staff by the following TSC positions which support activation of the TSC within 60 minutes of an Alert or higher classification:

- Emergency Director
- TSC Manager
- EAL Monitor
- Operations Coordinator
- Engineering Coordinator
- Rad/Chem Coordinator
- ERF Communicator
- ENS Communicator

The increased augmentation support in the TSC better supports the transfer of command/control functions from the Control Room within the existing 60 minute timeframe as described in the current Emergency Plan. Radiation protection support through augmentation of personnel to staff the OSRPF within 60 minutes remains unchanged.

This change is acceptable in that it is supported by the new positions added to the TSC for completion of the command and control functions.

### 3.2.3 Notification and Communications

NUREG-0654 Revision 1 requires one Communicator to be assigned on-shift. Revision 20 of the PBNP Emergency Plan contained one Communicator to perform this task. The current Revision of the PBNP Emergency Plan specifies two Communicators to perform this task. As a result of the proposed change, this task would remain with the security shift supervisor for up to 90 minutes until relieved. Based on the fact that this on-shift position is dedicated for this purpose, there would be no undue burden on the Control Room staff or impact on the notification function from an increase in initial augmentation time.

This change is acceptable as it maintains the capability of performing the Notification function.

### 3.2.4 Radiological Accident Assessment and Chemistry/Radio-Chemistry

The function of on-site radiological assessment is to review radiological conditions on-site using data from available instrumentation, assess the impact of changing radiological conditions on emergency classification, assist in accident assessment based upon those changing radiological conditions, and recommend appropriate on-site protective measures.

Classification is performed by the Shift Manager using PBNP Implementing procedures EPIP 1.2, "Emergency Classification" and EPIP 1.2.1, "Emergency Action Level Technical Basis," which use readily available plant instrumentation to determine the appropriate emergency classification. Off-site and on-site surveys provide additional sources of information, such as direct radiation measurements that could be directly applied to emergency classification. The on-shift Radiation Protection (RP) Technician takes direction from the Control Room to provide radiological assessment support until the OSC is activated.

The Control Room Supervisor uses symptom-based EOPs which minimize the need for specific accident assessment. The operating crew performs actions based on symptoms that are described in the EOPs, not based upon specific accident assessment.

Similarly, the Shift Manager (acting ED) uses flowcharts in EPIP 1.3, "Protective Action Recommendations," which prescribes the decision making processes by which off-site protective measures are recommended. The information needed to accomplish this allows for rapid decision making using readily available information by the Shift Manager (acting ED).

Therefore, the proposed change to the ERO augmentation time continues to meet the intent of the requirements of Appendix E to 10 CFR Part 50 and the standards of 10 CFR 50.47(b).

This Functional Area includes three tasks: EOF Director, Off-Site Dose Assessment and Chemistry/Radiochemistry, and Off-site, On-Site (out of plant) and In-Plant Surveys and Radiation Protection.

#### 3.2.4.1 Emergency Operating Facility Director

The EOF Director (Emergency Director or ED) is not assigned to the on-shift complement. The ED currently augments within 60 minutes of an Alert and relieves the on-shift ED of overall emergency management as well as all off-site responsibilities including Protective Action Recommendations (PARs) and emergency notifications.

Under this proposal, the Shift Manager (acting ED) is relieved by the Emergency Director in the TSC, a new position, who then assumes responsibility for overall control of the response efforts and the emergency response functions of classification, notification, dose assessment, and protective action recommendations upon activation of the TSC which would occur within 60 minutes of event classification. The EOF Manager arrives and relieves the ED of overall emergency management and off-site responsibilities including PARs, dose assessment and emergency notifications. The EOF is currently activated at an Alert to ensure timely mobilization of EOF personnel, including the EOF Manager.



The proposed change presents no adverse impact to the TSC staffing when compared to Revision 20 or the current revision of the PBNP Emergency Plan, because the ED still provides timely relief to the on-shift ED from the duties and responsibilities for offsite functions.

#### 3.2.4.2 Offsite Dose Assessment/Chemistry

On-shift capability for performance of the dose assessment function is currently assigned to an on-shift Operations Senior Reactor Operator (SRO). A review of the EOPs, AOPs, Emergency Plan, and the procedure used by Operations for off-normal plant conditions did not identify any conflicts between completion of dose assessment and other on-shift Operations functions within the time frame where the Operator would be required to perform dose assessment. With the improvements in the dose assessment program, as well as plant status, meteorological, and radiation monitoring data, Operations can perform dose assessments during emergency conditions in a more efficient manner than was available using the previous software. Required chemistry samples are collected by the on-shift chemistry technician. As such, both activities could be performed simultaneously.

Augmentation by the Rad/Chem Coordinator in the TSC (within 60 minutes) will relieve the SRO and assume dose assessment responsibilities. The TSC would retain this task until relieved by the Dose/PAR Coordinator in the EOF. There is no loss of function or impact on the timing for performing either of the tasks of dose assessment or required radiochemistry sampling by the proposed extension in augmentation times.

#### 3.2.4.3 Offsite/Onsite Surveys, In-Plant Surveys and RP

NUREG-0654 Revision 1 identifies only one on-shift "HP Technician" who is responsible for performing in-plant surveys.

In-plant surveys are normally performed in support of the dispatch of in-plant teams. NUREG-0654 further identifies two RP Technicians for the RP task but indicates that they "may be provided by shift personnel assigned other functions."

Revision 20 of the PBNP Emergency Plan identified one RP Technician who was assigned to the tasks for in-plant and on-site surveys. The current revision maintains this commitment.

Regarding in-plant surveys, personnel accessing the radiologically controlled areas (RCA) at Point Beach are required by procedure to obtain electronic personal dosimetry (EPD) prior to entry. The same EPD is also used as a "key" to unlock turnstiles to gain access to the RCA. Radiation work permits (RWPs) establish the necessary preset warnings/alarms associated with the EPD. An emergency reentry process has been developed for use during a declared emergency. Electronic personal dosimeters have their

emergency dose and dose rate alarms set manually. This assures that the teams dispatched to the in-plant areas to perform any function during a declared emergency will be afforded ample warning/alarm prior to exceeding their allowed dose or dose rate. Also, in-plant teams are briefed regarding radiological conditions prior to being dispatched. Thus, under emergency conditions, personnel responding to emergencies in a high radiation area will be knowledgeable of dose rates in the area, and radiation protection personnel may not be required to accompany all teams into the plant areas. The EPDs can also be programmed at the OSC by RP personnel as needed prior to team dispatch.

On-site, out of plant field teams and off-site field teams are typically used to verify the status of a potential release, but are not relied upon for timely indication. Installed effluent radiation monitors and in-plant radiation monitors would be able to detect any radioactive release quickly and accurately. The enhanced technology provided by the PPCS PI computer system and the dose assessment model provides visual indication of any radioactive plume and its calculated direction. Quantification of a radioactive release is determined by dose assessment which is performed on-shift. Dose calculations determine the radiological impacts of a release, as well as areas of concern which is used to develop offsite PARs or onsite protective actions. The dose assessment program can also provide a rapid estimate of core damage based on in-plant radiation monitor readings.

Although off-site survey data is available after the emergency response facilities are activated, monitoring of installed plant radiological instrumentation is sufficient for the first 90 minutes of an accident. Onsite, out of plant surveys can be used for verification of release or downwind monitoring as needed. Offsite survey data may be used to validate dose assessment.

With improved installed instrumentation, dose calculation model, PPCS computer modeling, and the increase of on-shift staffing, there is no more than minimal impact to the performance of these tasks as a result of the proposed changes to augmentation times.

### 3.2.5 Plant System Engineering, Repair and Corrective Actions

This functional area includes two tasks: Technical Support, Repair and Corrective Actions

#### 3.2.5.1 Technical Support

The current PBNP Emergency Plan identifies the STA as the on-shift person assigned this task. Augmentation to support the STA is currently provided by the Engineering Coordinator in the TSC within 60 minutes of an Alert classification. This capability will be maintained under the proposed change. Therefore, the proposed change does not affect this function.

### 3.2.5.2 Repair and Corrective Actions

NUREG-0654 Revision 1, Table B-1 specifies the functional area of "Repair and Corrective Actions," is to be fulfilled on shift by a total of two personnel who also "may be provided by shift personnel assigned other functions." It further identifies that the "position title or expertise" for the "repair and corrective actions" task could be filled by Mechanical Maintenance / Radwaste Operator, Electrical Maintenance or I&C Technician.

Revision 20 of the PBNP Emergency Plan stated that Damage Control & Repair actions for minor emergencies would be completed by plant personnel, including cleanup, repair and damage control. Historically, PBNP Auxiliary Operators (AOs) on-shift have performed these functions and maintain the necessary training and qualifications to respond to plant events and perform immediate actions to stabilize the plant.

Due to the time needed to stabilize the plant and assess the event, the initial phase of accidents is not expected to involve a significant need for maintenance personnel. Once plant status is understood and the plant is in a stable condition, attention can be focused on corrective maintenance that may be needed to restore plant capabilities.

Typically the initial stages of "corrective actions" will be minor or of limited scope, such as:

- Mechanical – Identification and operation of faulty valves, clogged filters, packing and seal adjustments, and troubleshooting,
- Electrical – Identification and correction of tripped breakers and overloads, and troubleshooting,
- I&C – Identification and correction of controller and set point adjustment, and troubleshooting.

Until the reactor is stabilized and the causal agents identified, actual repairs or realignment of plant equipment would not require large scale maintenance support. On-shift personnel are capable of performing initial maintenance activities until augmenting personnel arrive. Therefore, the proposed changes to augmentation times will not adversely affect the ability of the on-shift personnel to manage the initial stages of any emergency.

### 3.2.6 Protective Actions (In-Plant)

NUREG-0654 Revision 1 specifies two personnel on-shift who "may be provided by shift personnel assigned other functions." The Major Tasks specified are:

- access control,
- HP Coverage for repair, corrective actions, search and rescue, first aid, and firefighting,
- personnel monitoring, and
- dosimetry.

Revision 20 of the PBNP Emergency Plan did not specifically address this functional area. The current revision of the PBNP Emergency Plan addresses this functional area of Radiological Assessment and Protective Actions and Support of Operational Accident Assessment. As described previously, one HP Technician was assigned on-shift and responsible for the completion of these tasks including in-plant, on-site surveys.

Nuclear (non-licensed) Operators are qualified as Self-Monitors. Self-Monitors can also support these tasks. Self-Monitors are trained in the use of Geiger Mueller and ion chamber radiation meters and contamination handling and survey techniques including count rate instruments used in the field. Training includes proper use of survey equipment and the use of survey maps.

Nuclear Operators are typically dispatched prior to the call-out of augmented personnel. Normally the initial response phase involves search and rescue operations or manual manipulation of equipment. If used as Self-Monitors, the operators would be briefed on expected radiological conditions and would be provided survey instruments to monitor radiological conditions in the appropriate area(s). The results they generate are captured during debriefs.

Area Radiation Monitors (ARMs) are also used and reviewed prior to dispatch of personnel into the plant. Point Beach Nuclear Plant has multiple ARMs throughout the plant. The ARMs are located in areas where:

- Personnel perform regular duties in areas where radiation is present. These duties are performed once a day or more frequently,
- Personnel perform infrequent duties, but where there is a high probability that significant changes in radiation levels could occur,
- Personnel perform infrequent duties, or where there is a low probability that significant changes in radiation levels could occur, but where surveillance is desired.

As described previously, personnel accessing the RCA at Point Beach are required by procedure to obtain EPD prior to entry. The same EPD is also used as a "key" to unlock turnstiles to gain access to the RCA. Radiation work permits establish the necessary preset warnings/alarms associated with the EPD. An emergency reentry process has been developed for use during a declared emergency. Electronic personal dosimetry have their emergency dose and dose rate alarms set manually. This ensures that the person dispatched to the in-plant areas to perform any function during a declared emergency will be afforded ample

warning/alarm prior to exceeding his/her allowed dose or dose rate. Also, damage control teams are briefed prior to dispatch regarding radiological conditions. Thus, personnel responding to emergencies in a high radiation area will be knowledgeable of dose rates in the area without the need to send Radiation Personnel into the plant with the teams.

The flexibility offered by Nuclear Operators as Self-Monitors, the availability of ARM instrumentation (including availability of data via PPCS PI in the OSC) and the use of self-issued electronic alarming dosimetry ensure that the tasks under the Radiation Protection functional area are maintained and not impacted.

#### 3.2.7 Fire Fighting

There are no proposed changes to this area. The on-shift Fire Brigade is assigned this task throughout the emergency with off-site support provided by local fire departments.

#### 3.2.8 Rescue Operations and First Aid

Per NUREG-0654 Revision 1, this function "may be provided by shift personnel assigned other functions." The PBNP Emergency Plan utilizes on-shift AOs as Fire Brigade Team member to fulfill this function. There are no additional personnel augmented for this task. Local off-site support provides for any additional assistance. There are no proposed changes to this area; therefore, there is no impact represented by the change in augmentation times.

#### 3.2.9 Site Access Controls and Personnel Accountability

There are no proposed changes to this area. This function is part of the Security Contingency Plan and is staffed accordingly.

### 3.3 Conclusions

The proposed changes continue to support the functional areas of the Emergency Plan, continue to ensure the protection of the health and safety of the public and site personnel, and will not present a significant burden to the on-shift personnel as demonstrated in the On-Shift Staffing Analysis for Augmentation Changes. Although the ERO staffing augmentation response time is being increased, resulting in an increased ERF activation time, the emergency response functions identified in the Emergency Plan will continue to be performed by the on-shift staff until relieved by augmented ERO responders and will not result in a reduction of the capability of the ERO to effectively respond to the emergency. Therefore, the proposed increase in augmentation response continues to ensure the PBNP Emergency Plan will continue to meet 10 CFR 50.54(q)(2), the requirements of 10 CFR 50 Appendix E, and the planning standards of 10 CFR 50.47(b)

## 4.0 REGULATORY EVALUATION

### 4.1 Applicable Regulatory Requirements/Criteria

#### Title 10 Code of Federal Regulations 50.47(b)(1) and (2):

- (b) The onsite and, except as provided in paragraph (d) of this section, offsite emergency response plans for nuclear power reactors must meet the following standards:
  - (1) Primary responsibilities for emergency response by the nuclear facility licensee and by State and local organizations within the Emergency Planning Zones have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.
  - (2) On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available and the interfaces among various onsite response activities and offsite support and response activities are specified.

The existing Emergency Plan includes onsite and offsite emergency response plans that meet the requirements listed above. This LAR proposes to increase the current staff augmentation response times from 30 and 60 minutes to 60 and 90 minutes respectively. The Emergency Plan will continue to have onsite and offsite emergency response plans that meet 10 CFR 50.47(b).

#### Title 10 Code of Federal Regulations 50.54(q):

- (q) Emergency Plans
  - (1)(iv) Reduction in effectiveness means a change in an emergency plan that results in reducing the licensee's capability to perform an emergency planning function in the event of a radiological emergency.
  - (2) A holder of a license under this part, or a combined license under part 52 of this chapter after the Commission makes the finding under § 52.103(g) of this chapter, shall follow and maintain the effectiveness of an emergency plan that meets the requirements in Appendix E to this part and, for nuclear power reactor licensees, the planning standards of § 50.47(b).
  - (4) The changes to a licensee's emergency plan that reduce the effectiveness of the plan as defined in paragraph (q)(1)(iv) may not be implemented without prior approval by the NRC. A licensee desiring to make such a change after February 21, 2012 shall submit an application for an amendment to its license. In addition to filing requirements of § 50.90 and § 50.91, the request must include all emergency plan pages affected by

that change and must be accompanied by a forwarding letter identifying the change, the reason for the change, and the basis for concluding that the licensee's emergency plan, as revised, will continue to meet the requirements in Appendix E to this part and, for nuclear power reactor licensees, the planning standards of § 50.47(b).

The existing PBNP Emergency Plan meets the planning standards of 10 CFR 50.47(b) and 10 CFR 50 Appendix E as required by 10 CFR 50.54(q)(2). This LAR proposes to increase the current staff augmentation response times from 30 and 60 minutes to 60 and 90 minutes respectively. This proposed change to 60 and 90 minutes is considered a reduction in effectiveness as defined in 10 CFR 50.54(q)(1)(iv) and requires submittal based on 10 CFR 50.54(q)(4). Therefore, NextEra Energy Point Beach, LLC is submitting this LAR pursuant to 10 CFR 50.90.

The Emergency Plan will continue to meet the requirements of 10 CFR 50.54(q)(2) by maintaining the effectiveness of the Emergency Plan such that it meets the requirements of 10 CFR 50 Appendix E, and the planning standards of 10 CFR 50.47(b).

Title 10 Code of Federal Regulations Part 50 Appendix E:

A. Organization

The organization for coping with radiological emergencies shall be described, including definition of authorities, responsibilities, and duties of individuals assigned to the licensee's emergency organization and the means for notification of such individuals in the event of an emergency.

- A.9 By December 24, 2012, for nuclear power reactor licensees, a detailed analysis demonstrating that on-shift personnel assigned emergency plan implementation functions are not assigned responsibilities that would prevent the timely performance of their assigned functions as specified in the emergency plan.

The existing PBNP Emergency Plan includes a description of the organization, including definition of authorities, responsibilities and duties of individuals. The current Emergency Plan is in compliance with the new rule (10 CFR 50 Appendix E.IV.A.9). This LAR proposes to increase the current staff augmentation response times from 30 and 60 minutes to 60 and 90 minutes respectively. A staffing analysis has been performed to demonstrate continued compliance with 10 CFR 50 Appendix E.IV.A.9. The proposed changes to the Emergency Plan will continue to describe the authorities, responsibilities and duties of these individuals. Therefore, with the changes proposed in the LAR, the requirements of 10 CFR 50 Appendix E continue to be met.

NUREG-0654/FEMA-REP-1, Revision 1 (Reference 4)

NUREG-0654/FEMA-REP-1, Revision 1, Section II.B.5 states:

"Each licensee shall specify the positions or title and major tasks to be performed by the persons to be assigned to the functional areas of emergency activity. For emergency situations, specific assignments shall be made for all shifts and for plant staff members, both onsite and away from the site. These assignments shall cover the emergency functions in Table B-1 entitled, 'Minimum Staffing Requirements for Nuclear Power Plant Emergencies.' The minimum on-shift staffing levels shall be as indicated in Table B-1. The licensee must be able to augment on-shift capabilities within a short period after declaration of an emergency. This capability shall be as indicated in Table B-1."

NUREG-0654 Revision 1 provides general guidance concerning the onsite emergency organization to allow licensees some flexibility in the number of on-shift staff required by emergency plans for response to emergency events. NUREG-0654 guidance recommends that there be, in addition to on-shift personnel, 30-minute and 60-minute responders. The augmented ERO responders assume many managerial, engineering, and administrative duties from the on-shift personnel, allowing them to focus on plant operations. NUREG-0654 also provides the guidance that augmentation times be measured from the declaration of the emergency. The current PBNP Emergency Plan staffing in Table 5-1 meets the intent of NUREG-0654, Table B-1. This LAR proposes to extend the current staff augmentation response times from 30 and 60 minutes to 60 and 90 minutes respectively. The proposed changes have been evaluated in a staffing analysis performed to meet 10 CFR 50 Appendix E.IV.9 requirements. The proposed changes to the Emergency Plan continue to meet the intent of NUREG-0654, Table B-1 (i.e., continues to cover the emergency functional areas in Table B-1). This change is in alignment with NUREG-0654, Section II.B.5.

#### Conclusion

NextEra Energy Point Beach, LLC has evaluated the proposed change against the applicable regulatory requirements and acceptance criteria. The proposed Emergency Plan changes continue to assure that regulatory requirements and emergency planning standards associated with emergency response are met.

#### 4.2 Precedent

The proposed NextEra Energy Point Beach, LLC Emergency Plan changes are similar to changes submitted by other licensees, including Susquehanna (ML030830543), Fermi (ML102700478), River Bend (ML012710218) and Watts Bar (ML041810056). Furthermore, the proposed NextEra Energy Point Beach, LLC Emergency Plan changes and evaluation documented in this submittal continue to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50 Appendix E.

#### 4.3 No Significant Hazards Considerations Determination

In accordance with the requirements of 10 CFR 50.90, NextEra Energy Point Beach, LLC requests an amendment to facility Renewed Operating Licenses DPR-24 and DPR-27, for the PBNP, Units 1 and 2, to revise the Emergency Plan. Completion of an on-shift staffing analysis of the ERO determined that changes can be made to increase the staff augmentation times for certain ERO response functions from 30 and 60 minutes to 60 minutes and 90 minutes respectively. NextEra Energy Point Beach, LLC proposes to revise the ERO staff augmentation response times in the PBNP Emergency Plan.

NextEra Energy Point Beach, LLC has evaluated the proposed amendment against the standards in 10 CFR 50.92 and has determined that the operation of the PBNP in accordance with the proposed amendment presents no significant hazards. NextEra Energy Point Beach, LLC evaluation against each of the criteria in 10 CFR 50.92 follows.



1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed increase in staff augmentation times has no effect on normal plant operation or on any accident initiator or precursors and does not impact the function of plant structures, systems, or components (SCCs). The proposed change does not alter or prevent the ability of the ERO to perform their intended functions to mitigate the consequences of an accident or event. The ability of the ERO to respond adequately to radiological emergencies has been demonstrated as acceptable through a staffing analysis as required by 10 CFR 50 Appendix E.IV.A.9.

Therefore, the proposed Emergency Plan changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change does not impact the accident analysis. The change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed), a change in the method of plant operation, or new operator actions. The proposed change does not introduce failure modes that could result in a new accident, and the change does not alter assumptions made in the safety analysis. This proposed change increases the staff augmentation response times in the Emergency Plan, which are demonstrated as acceptable through a staffing analysis as required by 10 CFR 50 Appendix E.IV.A.9. The proposed change does not alter or prevent the ability of the ERO to perform their intended functions to mitigate the consequences of an accident or event.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

Margin of safety is associated with confidence in the ability of the fission product barriers (i.e., fuel cladding, reactor coolant system pressure boundary, and containment structure) to limit the level of radiation dose to the public. The proposed change is associated with the Emergency Plan staffing and does not impact operation of the plant or its response to transients or accidents. The change does not affect the Technical Specifications. The proposed change does not involve a change in the method of plant operation, and no accident analyses will be affected by the

proposed change. Safety analysis acceptance criteria are not affected by this proposed change. The revised Emergency Plan will continue to provide the necessary response staff with the proposed change. A staffing analysis and a functional analysis were performed for the proposed change on the timeliness of performing major tasks for the functional areas of Emergency Plan. The analysis concluded that an extension in staff augmentation times would not significantly affect the ability to perform the required Emergency Plan tasks. Therefore, the proposed change is determined to not adversely affect the ability to meet 10 CFR 50.54(q)(2), the requirements of 10 CFR 50 Appendix E, and the emergency planning standards as described in 10 CFR 50.47 (b).

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above evaluation, the NextEra Energy Point Beach, LLC has determined that operation of the facility in accordance with the proposed change does not involve a significant hazards consideration as defined in 10 CFR 50.92(c), in that it does not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

## **5.0 ENVIRONMENTAL CONSIDERATION**

NextEra Energy Point Beach, LLC has determined that the proposed change would not revise a requirement respect to installation or use of a facility or component located within the restricted area, as defined in 10 CFR 20, nor would it change an inspection or surveillance requirement. The proposed amendment does not involve (i) a significant hazards consideration, or (ii) authorize a significant change in the types or a significant increase in the amounts of any effluent that may be released offsite, or (iii) result in a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for a categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, NextEra Energy Point Beach, LLC concludes that pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the proposed amendment.

## **6.0 REFERENCES**

1. NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Revision 1, U.S. Nuclear Regulatory Commission and Federal Emergency Management Agency, November 1980.

**ENCLOSURE 1, ATTACHMENT 1**

**NEXTERA ENERGY POINT BEACH, LLC  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2**

**LICENSE AMENDMENT REQUEST 277  
REVISION TO STAFF AUGMENTATION TIMES IN THE  
PBNP EMERGENCY PLAN**

**MARKED-UP COPY PAGES OF EMERGENCY PLAN APPENDIX A  
AND SECTIONS 5.0, 6.0, 7.0**

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ORGANIZATIONAL CONTROL OF EMERGENCIES

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In the event of an Alert or higher classification level, the SM orders the activation of the TSC, OSC, EOF, OSRPF and JPIC. The on-site ERO is directed by the ~~TSC Manager~~ Emergency Director. The ~~Emergency Director~~ EOF Manager in the EOF provides overall coordination of the event and direction of the ERO.

If the SM determines that an Alert or higher emergency exists, the on-shift staff will assume an emergency mode of operation and the remaining ERO shall be activated. Initially, the on-shift staff will be augmented by critical positions that are designated in Table 5.1. The goal is to accomplish this augmentation within ~~30~~ 60 minutes for the TSC, OSC and OSRPF and 90 minutes for the EOF. ~~Additional ERO personnel will be in place~~ such that activation of TSC will be within 60 minutes and the EOF will be within 90 minutes ~~one hour~~.

The SM will direct plant response, assess and control the emergency, and initiate the required plant and offsite notifications in accordance with Figures 5-6 and 5-7. If the SM is incapacitated, an Operating Supervisor (OS) will assume the responsibility and authority of the SM (until relieved by a qualified individual) and coordinate the plant response, including the initiation of offsite notifications.

### 3.1 On-Shift Emergency Organization (B-1)

Each operating shift is shown in Figure 5-2 and consists of the following positions:

- 3.1.1 The SM, who holds a Senior Reactor Operator (SRO) license, is in direct charge of all plant operations during their assigned shift and is directly responsible for actions of the crew. The SM will be in the Control Room and maintain responsibility for operation of plant equipment and controls during emergency conditions other than fires. The SM's emergency classification will be determined by the Emergency Action Levels (EALs) in Appendix B. The SM will assume the responsibility of the Emergency Director (ED) and continue to assess the emergency until relieved of this responsibility by a qualified ED. If the incident is classified as an Alert or higher, the appropriate emergency response facilities as shown in Figures 5-3 through 5-5 will be activated.
- 3.1.2 Two OSs hold SRO licenses. The OSs report to the SM in the Control Room. The OSs perform initial assessment and evaluation of any abnormalities or emergency conditions. After the SM declares an emergency, the OSs maintain the normal duties of directing the Control Operators (COs) and the Auxiliary Operators (AOs).
- 3.1.3 Four COs hold Reactor Operator (RO) or SRO licenses. The COs report to the OSs and conduct the safe and proper operation of the unit at all times, and respond to emergency conditions, as necessary. One CO activates the Emergency Response Data System (ERDS) at Alert or higher classification.

### 3.2 Technical Support Center (TSC) and Operations Support Center (OSC) Organizations

The TSC & OSC Organizations are located on-site and illustrated in Figure 5-3.

Upon activation of the TSC, the ~~TSC Manager~~ Emergency Director will assume overall responsibility for the emergency response and for all onsite activities and personnel not directly related to plant operation. The ~~TSC Manager~~ Emergency Director will coordinate activities involving the Control Room, TSC, OSC, and Security Building. The TSC will assume parallel emergency assessment responsibility with the Control Room and will evaluate plant conditions and onsite radiological conditions. ~~Based upon this evaluation, the TSC Manager will recommend classification changes to the ED.~~ Responsibility for classification, notification, protective action recommendations, assessment, and evaluation will be transferred from the SM. The Operations Coordinator will assume responsibility for assessment and evaluation of the plant condition. Onsite radiation surveys and monitoring will be conducted under the direction of the Rad/Chem Coordinator. The Operations Support Center Coordinator will assume responsibilities for maintenance and repair coordination and search and rescue. An evacuation, or an assembly and subsequent evacuation, shall be ordered upon the classification of an Alert or higher. Reference EP 6.0, Emergency Measures, for additional details. TSC & OSC ERO assignments, by title, responsibilities, and principle working relationships are listed in Appendix A.

### 3.3 Emergency Operations Facility (EOF) & Offsite Radiation Protection Facility (OSRPF) Organizations

The EOF & OSRPF Organizations are located near-site and illustrated in Figure 5-4.

Upon activation of the EOF, the ~~ED~~ EOF Manager will assume overall responsibility for the emergency response and recovery.

Responsibility for offsite emergency response functions including ~~classification, assessment, evaluation,~~ notification, dose assessment, protective action recommendations, and recovery will be transferred from the ~~SM~~ ED. Offsite radiation surveys will be initiated as necessary from the OSRPF under the coordination of the Offsite Radiation Protection Coordinator. These surveys will be under the direction of the Dose/PAR Coordinator in the EOF. A liaison will be provided to state and local government agencies Emergency Operations Centers (EOCs) to assist in communications. EOF & OSRPF ERO assignments, by title, responsibilities, and principle working relationships are listed in Appendix A.

Additional actions may require extensive amounts of external resources. To ensure this, corporate headquarters may be contacted to provide or assist with offsite technical support.

Other personnel also report to the TSC and EOF to assist in the emergency response operations. Additional personnel will provide logistic, administrative, and scheduling support. These personnel will ensure 24-hour continuity for minimum staff positions.

### 3.4 Joint Public Information Center (JPIC)

The JPIC will activate to provide periodic updates to the media and public.

The JPIC Organization is illustrated in Figure 5-5.

## 4.0 OFFSITE EMERGENCY ORGANIZATION

This section describes offsite supporting assistance available to the onsite staff emergency response organization.

### 4.1 Corporate Support

Most ERO positions are filled by personnel assigned to NextEra Energy Point Beach. The NextEra Energy Point Beach normal operations staffing, as shown in Figure 5-1 has available the technical and administrative support services of the corporate offices. The ED EOF Manager will identify situations where additional assistance is needed and will relay the emergency assistance information to corporate management for evaluation.

Corporate will provide or obtain assistance for the onsite emergency organization as required. These responsibilities include, but are not limited to:

- 4.1.1 Providing senior company management support to the plant emergency organization.
- 4.1.2 Providing funds necessary to implement the NextEra Energy Point Beach Emergency Plan.
- 4.1.3 Providing contract security management direction and support for offsite facilities.
- 4.1.4 Coordinating the restoration and/or operation of all generation, transmission, and distribution facilities.
- 4.1.5 Monitoring reentry and/or recovery operations, post-accident planning, and assisting as requested.
- 4.1.6 Assisting with post-accident investigation and review responsibilities.
- 4.1.7 Providing general assistance for environmental monitoring.

ORGANIZATIONAL CONTROL OF EMERGENCIES

8.0 BASES

- B-1 PBNP Staffing Analysis performed and approved on 11/06/2013 (Rev 2) in accordance with NEI 10-05 (Rev 0), Assessment of On-Shift Emergency Response Organization Staffing Capabilities.

TABLE 5.1  
Minimum Staffing For Emergencies (B-1)

MAJOR FUNCTIONAL AREA	ON SHIFT STAFFING	
	POSITION/FUNCTION TITLE	Staffing
Plant Operations and Assessment of Operational Aspects	Shift Manager (SM)	1
	Operating Supervisor (OS)	2
	Control Operators (CO)	4
	Auxiliary Operators (AO) (1 FBL + 2 FBM) (Note 1)	5
	Shift Technical Advisor (STA)	1
Notification/ Communications	Communicator	Note 2
	Security Shift Supervisor (SSS) (State and Local Notifications)	1
Support Staff	Radiochemistry Technician	1
	Radiation Protection Technologist	1
Fire Brigade	Additional FBMs and/or AOs (Note 1)	2
TOTALS		18

FBL – Fire Brigade Leader FBM – Fire Brigade Member

Note 1: Total staffing for AOs/FBMs is 7. This includes a minimum of 5 AOs plus 2 additional FBMs which may be AOs.

Note 2: This position may be filled by the OS, AO, or STA.

MAJOR FUNCTIONAL AREA	AUGMENTATION STAFFING		
	POSITION TITLE	30 60 MINUTES	60-90 MINUTES
Emergency Direction and Control	Emergency Director (TSC)	1	1
	TSC Manager	1	
	EOF Manager		1
	Assistant EOF Manager		1
	EAL Monitor	1	
Plant System Engineering / Repair and Corrective Actions Protective Actions	Operations Coordinator	1	1
	Engineering Coordinator	1	1
	OSC Coordinator	1	1
	Rad/Chem Coordinator (Dose Assessment)	1	
	Operations Leader (OSC)	1	1
	Radiation Protection Leader (OSC)	1	1
	I&C Leader (OSC)	1	
	Mechanical or Electrical Leader (OSC)	1	
	Chemistry (OSC)	1	
	Resource Coordinator (EOF)		1
	Dose/PAR Coordinator (EOF)	1	1
	OSRPF Coordinator	1	1
	Field Team Leader	1	1
	Field Monitoring Team #1	1	1
	Field monitoring Team #2	1	1
Communications	ERF Communicator (TSC)	1	1
	ERF Communicator (EOF)		1
	ENS Communicator (TSC)	1	1
	State/County Communicator (EOF)		1
TOTALS		6 18	16 6

FIGURE 5-2  
ON-SHIFT EMERGENCY ORGANIZATION

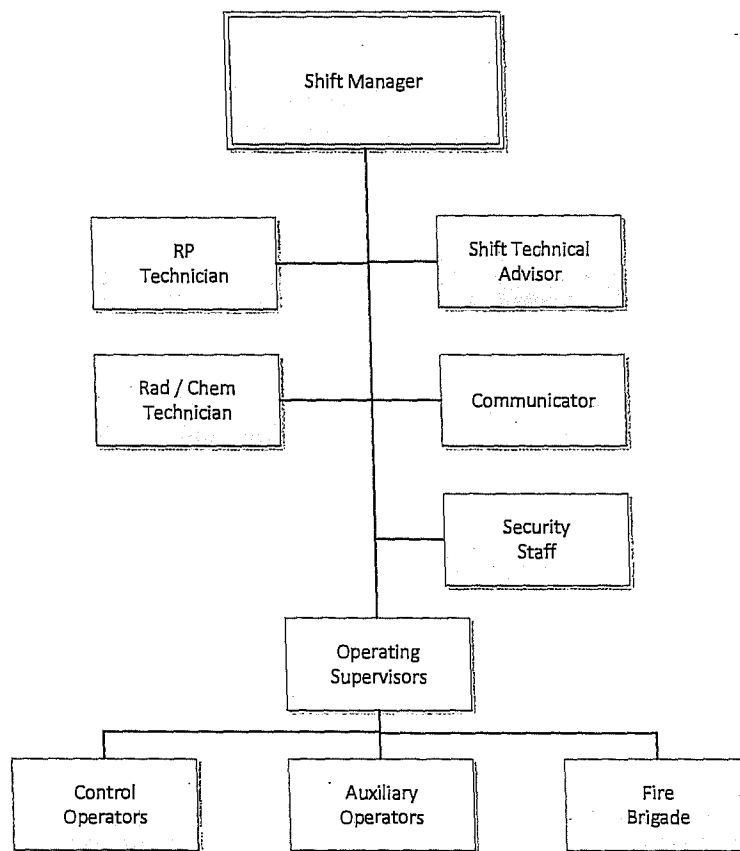




FIGURE 5-3  
TECHNICAL SUPPORT CENTER (TSC) AND OPERATIONS SUPPORT CENTER (OSC)

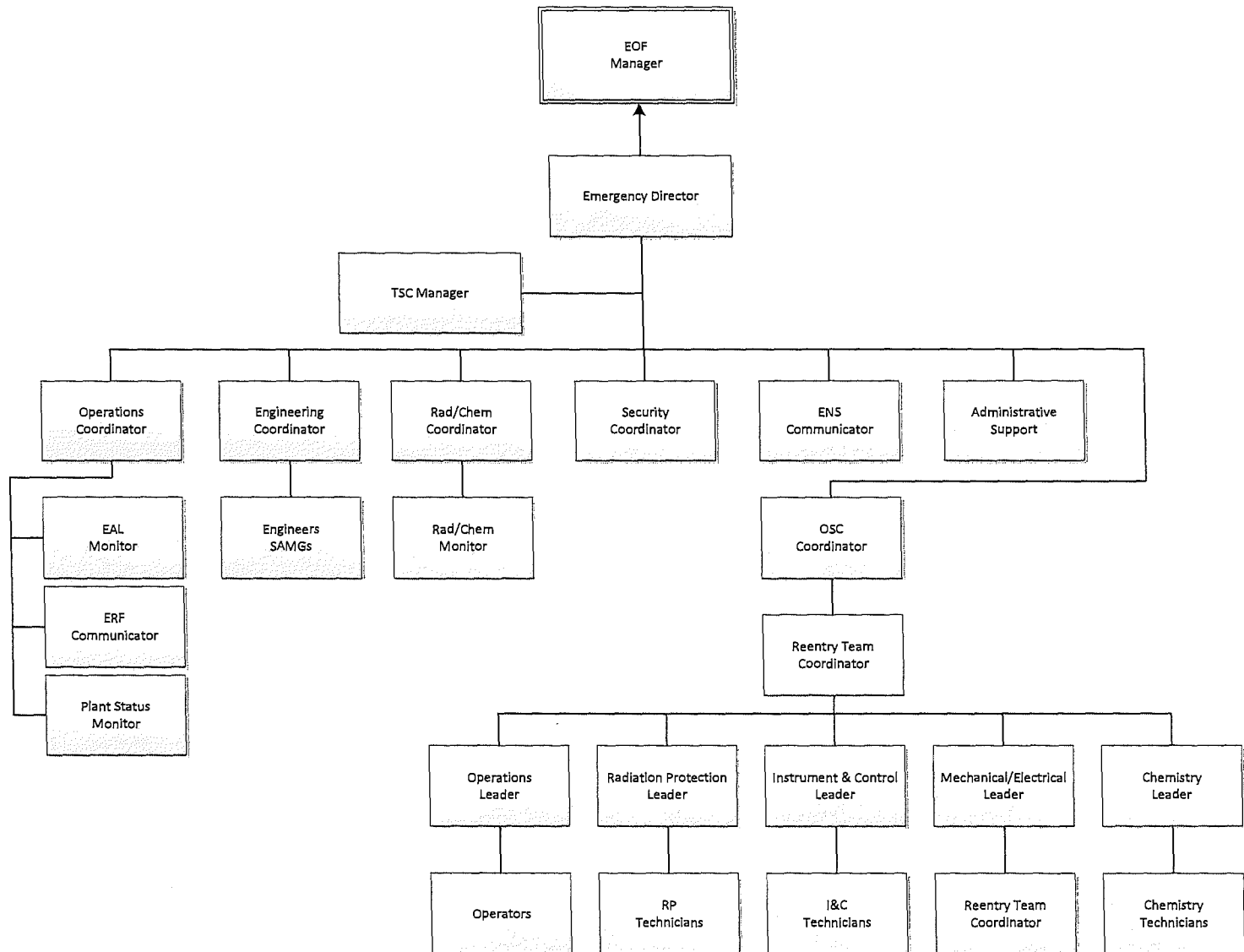


FIGURE 5-4  
EMERGENCY OPERATIONS FACILITY (EOF) AND OFFSITE RADIATION PROTECTION FACILITY (OSRPF)

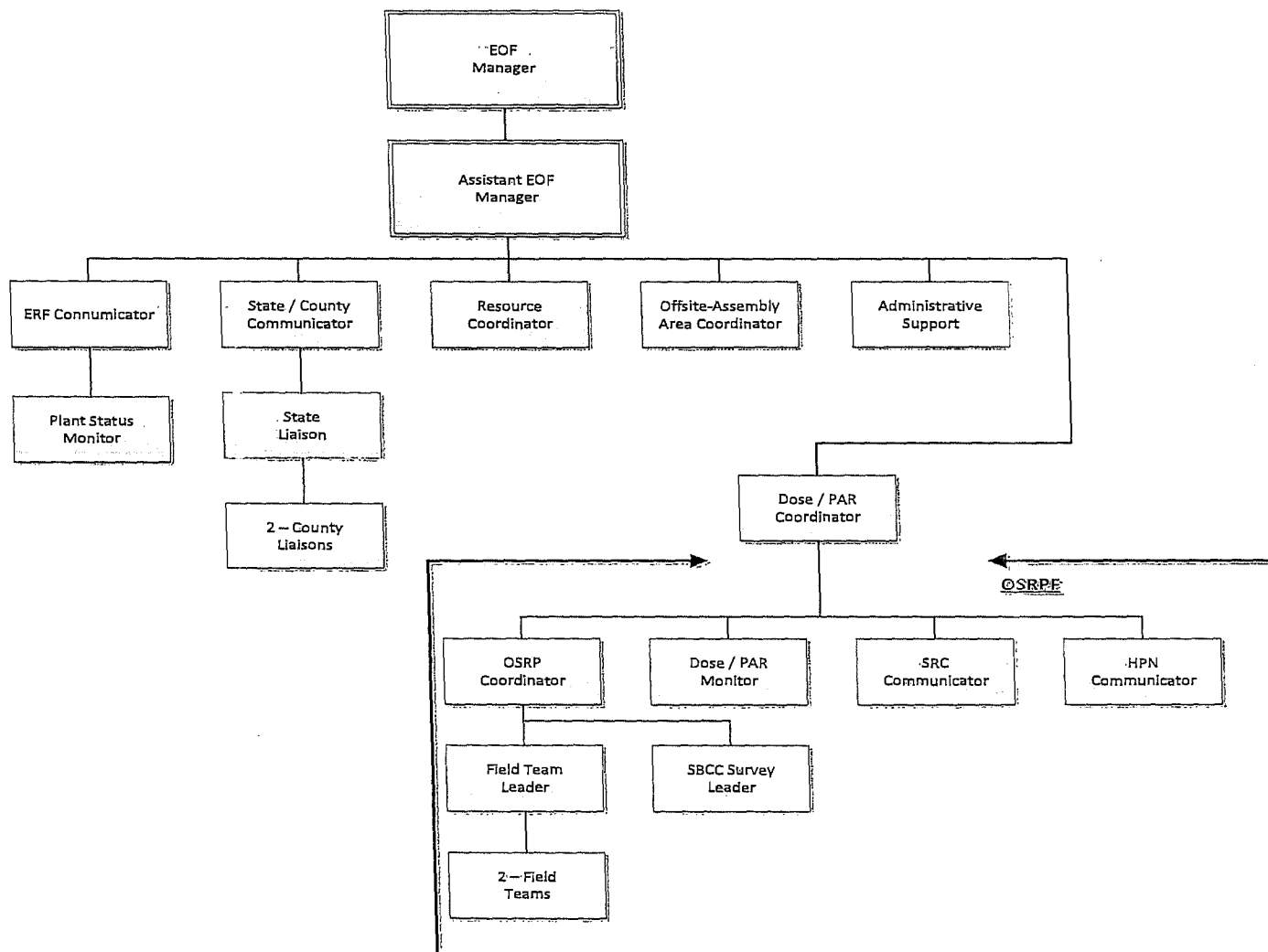
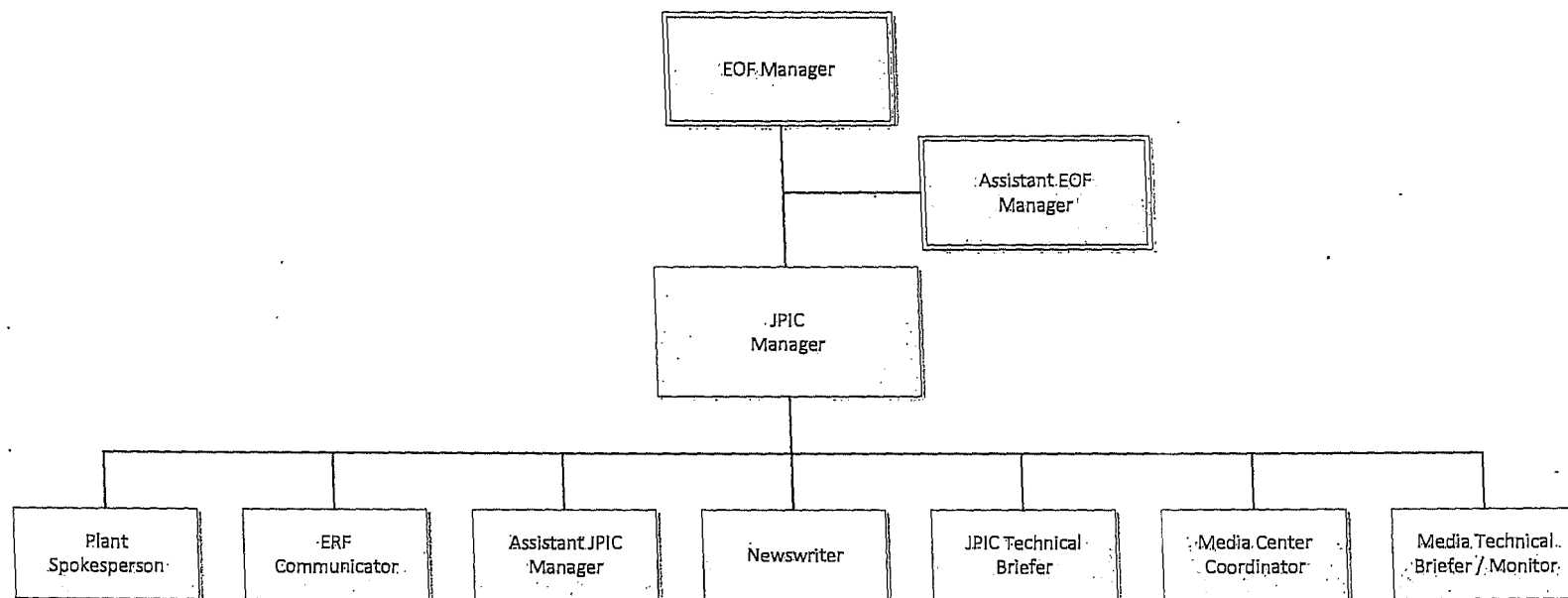
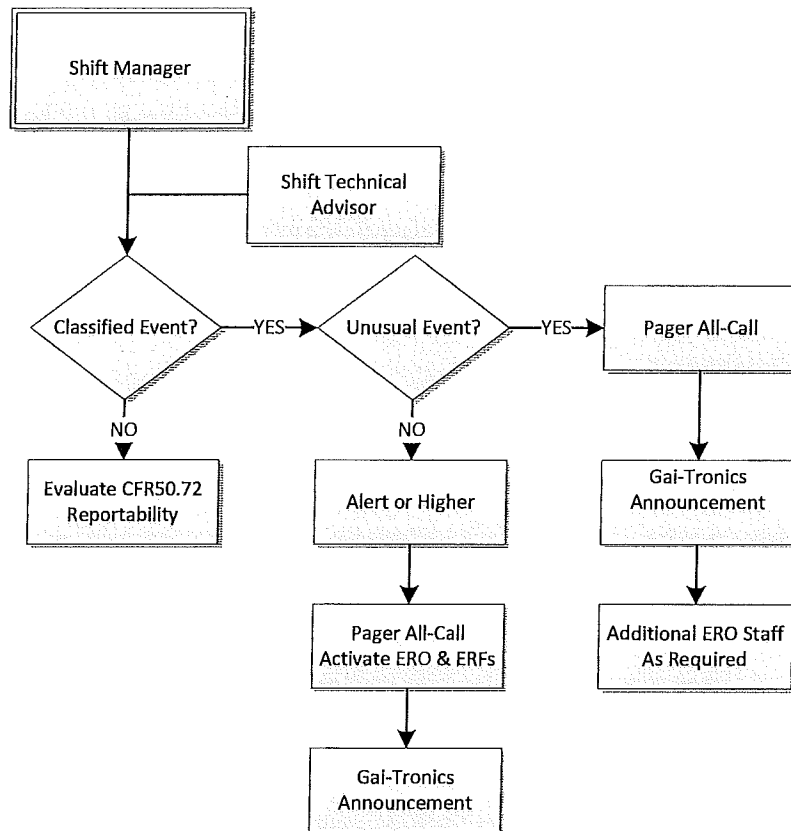


FIGURE 5-5  
JOINT PUBLIC INFORMATION CENTER (JPIC)



ORGANIZATIONAL CONTROL OF EMERGENCIES

FIGURE 5-6  
EMERGENCY NOTIFICATION SEQUENCE



### 3.2 Damage Control and Repair

For minor emergencies, the plant personnel will normally be able to handle the cleanup, repair, and damage control. For major emergencies, the support of other company personnel or specialized outside contractors may be required to assist in the damage control, cleanup, and repair operation. Emergency response operations will be handled with the assistance of agencies available for that purpose.

Personnel exposure to radiation and radioactive materials during corrective actions should be controlled as stipulated in EP 6.0, Section 5.1.

## 4.0 PROTECTIVE ACTIONS

The EPIP used in classifying emergencies has predetermined EALs that, when met or exceeded, will require protective actions to be taken. In addition, the Shift Manager may initiate EPIPs when they are determined to be necessary. EPIPs include assessment actions, corrective actions, and protective actions as appropriate.

Protective actions will ensure that personnel, both on and offsite, will be notified and actions initiated for their protection in the event radiation or airborne activity levels from a radiological emergency onsite exceed or are predicted to exceed predetermined values, or when other situations threaten personnel safety.

Protective actions taken within the exclusion and protected area (onsite) are the responsibility of the SM and TSC Manager Emergency Director with input from the Operations Coordinator, while those taken offsite fall under the jurisdiction of Wisconsin Emergency Management with the resources of the State Division of Health and Family Services, Radiation Protection Unit, and the Manitowoc and Kewaunee County Emergency Managements. Recommendations of protective actions to be taken offsite will be made only by the Emergency Director- EOF Manager. It is recognized that at the beginning of an emergency evolution, the Shift Manager will have the responsibility and authority of the Emergency Director until relieved.

Operations Department Abnormal Operating procedures (AOPs) contain specific instructions for the notification of protective actions for onsite personnel during hostile action-based events.

### 4.1 Protective Actions, Evacuation, and Personnel Accountability

This subsection provides for the timely relocation of individuals to prevent or minimize exposure to direct or airborne radiation or toxic/flammable gas intrusion.

#### 4.1.1 Exclusion Area

##### a. Action Criteria

Protective actions for personnel onsite shall be taken when a radiological emergency has occurred, or may occur, which will result in concentrations of airborne activity or radiation levels that exceed normal limits for a specific area or areas and cannot be readily controlled. In addition, protective actions shall be taken for onsite personnel in such situations as toxic/flammable gas intrusion, fire, meteorological danger, etc., where personnel safety is threatened.

d. Assembly and Evacuation

Personnel assembly, and evacuation at NextEra Energy Point Beach will depend on the nature of the emergency and the extent of the area affected. The Shift Manager, or the ~~TSC Manager~~ Emergency Director if the TSC is activated, shall initiate any limited evacuation or full-site assembly, and/or evacuations. These protective actions shall be made after careful consideration of the benefits and risks involved. The details of these protective actions are included in the EPIPs. In general, these protective actions shall be in accordance with the following:

1. A limited evacuation (withdrawal of personnel from affected portion(s) of the plant) shall be considered when any of the following conditions exist:
  - (a) Unscheduled area radiation monitor high-level alarm.
  - (b) Conditions which indicate a valid containment high-flux-at-shutdown alarm is necessary.
  - (c) Unevaluated airborne radioactive concentrations in excess of the derived air concentrations (DACs) specified in Appendix B to 10 CFR 20.
  - (d) Excessive radioactive surface contamination levels.
  - (e) Other emergency conditions, such as fire, or toxic/flammable gas intrusion that may endanger human life or health.

The criteria for these radiation levels, alarms and conditions do not apply to anticipated increases or alarms resulting from planned operations.

When a limited evacuation is ordered, personnel in the room, area, or building will proceed as directed. If evacuation is from areas within the RCA, personnel will proceed to the RP station for accountability and contamination monitoring.

If a hazard continues to increase in severity or spreads to other areas, and the Shift Manager or ~~TSC Manager~~ Emergency Director deems it necessary, an evacuation or an assembly and subsequent evacuation may also be ordered.

2. An evacuation, or an assembly and subsequent evacuation shall be ordered upon the classification of an Alert or higher.

6. At the discretion of the ~~TSC Manager~~ Emergency Director, the assembled non-ERO personnel may be evacuated from the site when chemical, radiological, or meteorological conditions allow, or if conditions warrant, take additional actions, such as radiological monitoring and relocation.
7. Evacuation of a specific emergency response facility (ERF) will be considered when habitability or function of that facility is questionable

e. Personnel Accountability

Assembly and Evacuation actions are contained in Step 4.1.1.d and Table 6-2. Personnel accountability shall be conducted at an Alert classification or higher. Accountability is the responsibility of the Shift Manager or ~~TSC Manager~~ Emergency Director, in conjunction with the Security Coordinator. During an emergency situation that requires personnel in the plant to assemble in the various assembly areas, management personnel should help ensure that all their personnel are accounted for.

Accountability, within the Protected Area of the plant, should take no longer than 30 minutes from the time of the announcement. The Security Shift Supervisor will verify complete accountability using the security computer or the manual accountability procedure, and will forward this information to the ~~TSC Manager~~ Emergency Director. If the TSC is not activated, this information will be forwarded to the Shift Manager. If personnel are unaccounted for, teams will be dispatched to locate and, if necessary, rescue the personnel. Personnel accountability procedures are included in the EPIPs.

Accountability outside the Protected Area is accomplished by Security physically entering the plant buildings to check for personnel. Aid to affected personnel will be provided as specified in Section 6.0.

f. Radiological Monitoring of Personnel Evacuated from Site

Requirements for external radiation exposure monitoring are contained in Section 5.0. A combination of checking SRDs/EPDs, if worn, and questioning of evacuees will be used to determine if there were any significant external exposures received prior to evacuation. Section 6.0 addresses appropriate actions for any known or suspected overexposures.

If normal contamination monitoring is not possible, monitoring for contamination and internal exposure at the OSRPF and OSC shall be accomplished by using portable instrumentation, as necessary. Any persons suspected or known to have ingested or inhaled radioactive material will be whole body counted to assess internal exposure as soon as

conditions permit.  
4.1.2 Offsite Area (Area Beyond the Exclusion Area)

a. Dose Projections (Reference 7.7)

Dose projections may be performed by a software application using meteorological information, plant parameters, and a dose assessment process to perform real time dose assessments during an inadvertent release of radioactive materials. Terminals for completing dose projections are located in the Control Room, TSC, EOF, and Alternate EOF. Meteorological data is stored and processed in the Plant Process Computer System (PPCS/PI) as described in EP Appendix L. Radiological effluent monitoring data is also available from PPCS/PI and may be manually entered into the dose assessment program. With meteorological and effluent release data available, calculations of atmospheric dispersion and offsite radiation dose from the plume can be made. Dose calculations are made for Total Effective Dose Equivalents (TEDE) and Thyroid Committed Dose Equivalents (Thyroid CDE). Calculation results can be printed in report format. Projected calculations take into account values of time of release and duration of release. The dose assessment computer allows accident dose calculations to be made before results from the offsite Field Monitoring Teams are received. Manual calculation methodologies for offsite dose calculations are available in case of computer system failures.

Field Monitoring Team results may be used to verify the dose calculations. Field Monitoring Teams will conduct a search for the plume, obtain dose rates, and sample at pre-designated sample locations as described in EP Appendix C.

The Dose/PAR Coordinator or the Rad/Chem Coordinator may determine the applicable dose rates in the EPZ and calculate an estimated total population dose. The ~~Emergency Director~~ EOF Manager shall ensure that radiological information and recommendations for protective actions are transmitted to the offsite authorities.



## 1.0 DISCUSSION

This section of the Emergency Plan identifies, describes, and gives locations of emergency operation centers, support centers, communication systems, and first-aid and medical facilities. EP Appendix M, Matrix for Emergency Preparedness Equipment, also provides a snapshot of Emergency Preparedness related equipment, including the location, purpose, and regulatory requirement of such equipment. This appendix was developed as a NextEra Energy Point Beach Excellence Plan Confirmatory Action Letter (CAL) commitment. (B-3)

## 2.0 CENTERS FOR EMERGENCY OPERATIONS

The Emergency Response Facilities (ERFs) are coordinated centers, separated physically to minimize interference and confusion, and connected by dedicated communications lines to ensure an uninterrupted flow of information. Figure 7-1 shows the emergency communications network that will allow coordination of all phases of the emergency response operations.

### 2.1 Emergency Operations Facility (EOF) (See EP 2.0)

The EOF is located at the Site Boundary Control Center (SBCC) with an alternate location at 3060 Voyager Drive, Green Bay, WI. Communications links will be maintained with the TSC, JPIC, OSRPF, and corporate offices, designated offsite federal and state agencies, and offsite field monitoring teams. Up to 700 sq. ft. can be made available to accommodate state and local agency personnel.

This facility, under the direction of the EOF Manager, is the focal point for overall NextEra Energy Point Beach emergency response and is the location of primary interface between NextEra Energy Point Beach and offsite agencies. This facility will be activated by plant personnel within ~~one hour~~ 90 minutes of the declaration of an Alert or higher classification. Comprehensive coordination is achieved by:

- 2.1.1 The ~~Emergency Director~~ EOF Manager is located in this facility and responsible for the overall management of the emergency response and recovery operations for the NextEra Energy Point Beach.
- 2.1.2 Maintaining communication links with the other Emergency Response Facilities (ERFs) and receiving periodic updates of the progress of the emergency procedures.
- 2.1.3 Providing a single contact point for state and local emergency response agencies and providing timely, accurate information.
- 2.1.4 Coordinating the transfer of injured personnel who are radiologically contaminated and need treatment by local health care personnel.
- 2.1.5 Providing for offsite radiological surveys including transportation, equipment, and personnel.

- 2.1.6 Act as focal point for security and traffic control.
- 2.1.7 Act as focal point for technical review of information released to the media.
- 2.1.8 Disseminating information to the corporate personnel for technical and administrative support.
- 2.1.9 Managing recovery operations of an emergency (long-term staffing, scheduling, and expediting).
- 2.1.10 Implement Quality Control program for construction and repair tasks that may be necessary.
- 2.1.11 Primary interface between outside organizations, responding vendors and contractors.
- 2.1.12 Monitor meteorological data, plant conditions and data.

2.2 Offsite Radiation Protection Facility (OSRPF) (See EP 2.0)

The radiation protection operation of the SBCC is the responsibility of the Offsite Radiation Protection Coordinator who reports to the Dose/PAR Coordinator at the EOF. The facility will be activated by plant personnel within one hour of an Alert or higher classification. This portion of the SBCC provides:

- 2.2.1 Personnel accountability, contamination monitoring, and a decontamination point for evacuated visitors, plant and contractor personnel.
- 2.2.2 A radiation protection (RP) control point for individuals entering or leaving the site.
- 2.2.3 A central point for offsite radiological field monitoring teams, with an alternate location from the Technical Support Center (TSC)/Operations Support Center (OSC).

2.3 Technical Support Center (TSC) (See EP 2.0)

The TSC is located on El. 8' of the Admin Building. There are direct communication links with the Control Room, OSC, and EOF.

This facility, under the direction of the ~~TSC Manager~~ Emergency Director coordinates all onsite emergency response. This facility will be activated by plant personnel within one hour of the declaration of an Alert or higher classification. This facility provides:

- 2.3.1 The primary communications link between the Control Room, OSC, and EOF.

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

---

**TABLE OF CONTENTS**

SECTION	TITLE	PAGE
1.0	ADMINISTRATIVE SUPPORT LEADER.....	5
2.0	ASSISTANT EOF MANAGER .....	5
3.0	CHEMISTRY LEADER.....	6
4.0	COUNTY LIAISON .....	6
5.0	DOSE/PAR COORDINATOR.....	7
6.0	DOSE/PAR MONITOR.....	7
7.0	SHIFT MANAGER .....	8
8.0	SHIFT TECHNICAL ADVISOR (STA).....	8
9.0	EAL MONITOR .....	9
10.0	ELECTRICAL LEADER .....	9
11.0	ELECTRICAL/I&C ENGINEER.....	9
12.0	ENGINEERING COORDINATOR .....	11
13.0	ENS COMMUNICATOR.....	11
14.0	EOF MANAGER.....	12
15.0	ERF COMMUNICATOR-TSC .....	13
16.0	FIELD TEAM LEADER .....	13
17.0	HPN COMMUNICATOR .....	14
18.0	I&C LEADER.....	14
19.0	JPIC MANAGER.....	14
20.0	MECHANICAL LEADER .....	15
21.0	MECHANICAL SYSTEM ENGINEER .....	15
22.0	OFFSITE ASSEMBLY AREA COORDINATOR .....	15

## TABLE OF CONTENTS

SECTION	TITLE	PAGE
23.0	OFFSITE RADIATION PROTECTION COORDINATOR.....	16
24.0	OPERATIONS COORDINATOR.....	16
25.0	OPERATIONS LEADER.....	17
26.0	OPERATIONS SUPPORT CENTER COORDINATOR .....	17
27.0	PLANT STATUS MONITOR.....	17
28.0	PROBABILISTIC RISK ASSESSMENT ENGINEER .....	18
29.0	RAD/CHEM COORDINATOR .....	18
30.0	RAD/CHEM MONITOR.....	19
31.0	RADIATION PROTECTION LEADER.....	19
32.0	REACTOR/CORE PHYSICS ENGINEER.....	20
33.0	REENTRY TEAM COORDINATOR.....	20
34.0	RESOURCE COORDINATOR.....	21
35.0	SBCC SURVEY LEADER.....	21
36.0	SECURITY COORDINATOR.....	22
37.0	SRC COMMUNICATOR.....	22
38.0	STATE LIAISON .....	22
39.0	STATE/COUNTY COMMUNICATOR.....	23
40.0	EMERGENCY DIRECTOR .....	23
41.0	TSC MANAGER.....	24
42.0	ERF COMMUNICATOR-EOF .....	24
43.0	ERF COMMUNICATOR-CR .....	25
44.0	PLANT SPOKESPERSON .....	25

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

---

Criteria which may be considered during the selection of personnel for emergency organization positions include the qualification criteria required for normal operational job functions, the managerial and technical capabilities demonstrated in the performance of their normal administrative job functions, and completion of the appropriate emergency plan training. Onsite and offsite organizations and facility staff organization and qualifications are described in Technical Specifications Section 5.2, Administrative Controls - Organization.

The Emergency Response Organization charts and reporting structure are located in EP 5.0, Organizational Control of Emergencies.

1.0 ADMINISTRATIVE SUPPORT LEADER

1.1 Responsibilities

- 1.1.1 Provide clerical and administrative support to responding ERO personnel at the TSC, EOF and OSC.
- 1.1.2 Ensure each position has adequate office supplies, procedures, and operational equipment to perform their duties.
- 1.1.3 Coordinate records management, duplication and distribution of all documents, fax transmittals, word processing, event recording, and other office support for the emergency response facilities.

1.2 Principal Working Relationships

Resource Coordinator, TSC Manager, EOF Manager, Reentry Team Coordinator

2.0 ASSISTANT EOF MANAGER

2.1 Responsibilities

- 2.1.1 Ensure EOF has an adequate staffing level to respond to the event.
- 2.1.2 Maintain an information flow with the Control Room and TSC to establish priorities and focus.
- 2.1.3 Ensure initial and continuing communications are maintained with offsite agencies.
- 2.1.4 Interface with responding representatives from offsite emergency agencies and assist in their information and communication needs.
- 2.1.5 Maintain accountability of personnel at the EOF and assess and provide for any considerations necessary for their safety.
- 2.1.6 Fill out the Nuclear Accident Reporting System (NARS) form.

2.2 Principal Working Relationships

EOF Manager, Emergency Director, TSC Manager, JPIC Manager

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

---

5.0 DOSE/PAR COORDINATOR

5.1 Responsibilities

- 5.1.1 Direct offsite dose assessment, provide input to classification and protective action recommendations.
- 5.1.2 Communicate periodically with the State Radiological Coordinator regarding offsite conditions, dose projections, PARs, and status updates.
- 5.1.3 Monitor facility radiological conditions and hazards.
- 5.1.4 Recommend when it is necessary to authorize dose in excess of the maximum NextEra Energy Point Beach yearly administrative level, or in excess of the 10 CFR 20.1201 limits.
- 5.1.5 Review current or potential exposures and recommend when potassium iodide should be distributed to emergency workers as a protection measure.

5.2 Principal Working Relationships

EOF Manager, Assistant EOF Manager, OSRP Coordinator, HPN and SRC Communicators, Dose/PAR Monitor

6.0 DOSE/PAR MONITOR

6.1 Responsibilities

- 6.1.1 Assist the Dose/PAR Coordinator with offsite dose assessment and development of Protective Action Recommendations (PARs).
- 6.1.2 Maintain communications with the Field Team Leader for current field monitoring team data.
- 6.1.3 Periodically obtain current weather forecasts and update the status boards as necessary.
- 6.1.4 Maintain the Rad/Met status board based upon changes in protective actions, classification, radiological release status, or significant changes in meteorology.

6.2 Principal Working Relationships

Dose/PAR Coordinator, Field Team Leader, OSRP Coordinator

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

---

9.0 EAL MONITOR

9.1 Responsibilities

- 9.1.1 Monitor plant parameters for potential changes in Emergency Action Level and Protective Action Recommendation.
- 9.1.2 Monitor and recommend changes to classification, radiological release status and Protective Action Recommendations.
- 9.1.3 Maintain the fission product barrier status board.
- 9.1.4 ~~Fill out Nuclear Accident Reporting System (NARS) form.~~

9.2 Principal Working Relationships

Emergency Director, ~~EOF~~ TSC Manager, ERF Communicator-~~EOF~~ TSC, Plant Status Monitor, Dose/PAR Coordinator

10.0 ELECTRICAL LEADER

10.1 Responsibilities

- 10.1.1 Prepare, brief, and dispatch reentry teams on job scope, safety, and hazardous conditions.
- 10.1.2 Analyze electrical problems and develop plans for monitoring and controlling plant problems.

10.2 Principal Working Relationships

Reentry Team Coordinator, Reentry Teams

11.0 ELECTRICAL/I&C ENGINEER

11.1 Responsibilities

- 11.1.1 Analyze problems with the operation of plant systems and equipment and develop plans or modifications to mitigate any concerns.
- 11.1.2 Provide engineering support including Severe Accident Management response.

11.2 Principal Working Relationships

Engineering Coordinator

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

---

~~12.0~~ EMERGENCY DIRECTOR

~~12.1~~ Responsibilities

- ~~12.1.1~~ Overall management and responsibility for the emergency response and recovery operations for NextEra Energy Point Beach, with the non-delegable responsibilities for decisions regarding:
- ~~a.~~ Approval of classification/re-classification of emergencies.
  - ~~b.~~ Approval of Protective Action Recommendations for offsite agencies.
  - ~~c.~~ Ensuring notification of Federal, State, and County authorities.
  - ~~d.~~ Request for federal assistance.
  - ~~e.~~ Authorizing the use of potassium iodide (KI).
  - ~~f.~~ Authorizing emergency radiation exposures in excess of 10 CFR 20 limits or in excess of maximum NextEra Energy Point Beach yearly administrative level.
- ~~12.1.2~~ Serve as a senior company contact for offsite governmental agencies at the site (NRC, FEMA, Wisconsin Emergency Management, county authorities).
- ~~12.1.3~~ Provide or delegate the responsibility to provide the JPIC personnel with information for use by the news media during an emergency.

~~12.2~~ Principal Working Relationships

Shift Manager, TSC Manager, EOF Manager, JPIC Manager, Plant Spokesperson



EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

---

12.0 ENGINEERING COORDINATOR

12.1 Responsibilities

- 12.1.1 Provide the administrative and technical oversight of any engineers.
- 12.1.2 Evaluate plant onsite power availability and preferred operating status for unaffected unit.
- 12.1.3 Direct, coordinate, and approve engineering, design and construction activities on site.
- 12.1.4 Ensure that the engineering and design activity is adequately staffed and equipped to provide timely support.
- 12.1.5 Assist in the planning, scheduling, and expediting of recovery operations.
- 12.1.6 Provide SAMG Team direction.
- 12.1.7 Analyze problems with the operation of plant systems and equipment.

12.2 Principal Working Relationships

Emergency Director ~~TSC Manager~~, Reactor/Core Physics Engineer, PRA Engineer, Mechanical Systems Engineer, Electrical/I&C Engineer

13.0 ENS COMMUNICATOR

13.1 Responsibilities

- 13.1.1 Ensuring the NRC has adequate information.
- 13.1.2 Immediately (NOT to exceed 1 hour) informing the NRC of changes in emergency classification, radiological release status, or protective action recommendations (initial, upgrades, de-escalation, termination).
- 13.1.3 Providing plant and radiological status updates to the NRC.
- 13.1.4 Monitor the event for potential licensing concerns.

13.2 Principal Working Relationships

Emergency Director ~~TSC Manager~~, NRC via ENS

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

---

14.0 EOF MANAGER

14.1 Responsibilities

- 14.1.1 Command and control of the Emergency Operations Facility, including the Offsite Radiation Protection Facility and site access.
- 14.1.2 ~~Ensure EOF has an adequate staffing level to respond to the event.~~ Overall management and responsibility for the emergency response and recovery operations for NextEra Energy Point Beach, with the non-delegable responsibilities for decisions regarding:
  - a. Approval of Protective Actions Recommendations for offsite agencies.
  - b. Ensuring notification of Federal, State and County authorities.
  - c. Request for federal assistance.
  - d. Authorizing the use of potassium iodide (KI).
  - e. Authorizing emergency radiation exposures in excess of 10 CFR 20 limits or in excess of maximum NextEra Energy Point Beach yearly administrative level.
- 14.1.3 ~~Maintain an information flow with the Control Room and TSC to establish priorities and focus.~~ Serve as senior company contact for offsite governmental agencies at the site (NRC, FEMA, Wisconsin Emergency Management, county authorities).
- 14.1.4 ~~Ensure initial and continuing communications are maintained with offsite agencies.~~ Provide or delegate the responsibility to provide the JPIC personnel with information for use by the news media during an emergency.
- 14.1.5 ~~Interface with responding representatives from offsite emergency agencies and assist in their information and communication needs.~~
- 14.1.6 ~~Maintain accountability of personnel at the EOF and assess and provide for any considerations necessary for their safety.~~

14.2 Principal Working Relationships

Emergency Director, Assistant EOF Manager , TSC Manager, Dose/PAR Coordinator,  
~~EAL Monitor~~ JPIC Manager, Plant Spokesperson

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

---

19.2 Principal Working Relationships

~~Emergency Director~~ EOF Manager , Assistant EOF Manager, Plant Spokesperson,  
Assistant JPIC Manager, Newswriter

20.0 MECHANICAL LEADER

20.1 Responsibilities

20.1.1 Prepare, brief, and dispatch reentry teams on job scope, safety, and hazardous conditions.

20.1.2 Analyze mechanical problems and develop plans for monitoring and controlling plant problems.

20.2 Principal Working Relationships

Reentry Team Coordinator, Reentry Teams

21.0 MECHANICAL SYSTEM ENGINEER

21.1 Responsibilities

21.1.1 Analyze problems with the operation of plant systems and equipment and develop plans or modifications to mitigate any concerns.

21.1.2 Provide engineering support including Severe Accident Management response.

21.2 Principal Working Relationships

Engineering Coordinator

22.0 OFFSITE ASSEMBLY AREA COORDINATOR

22.1 Responsibilities

22.1.1 Control and organize the release of personnel assembled in onsite and offsite assembly areas.

22.1.2 Assist with radiological monitoring of evacuees and vehicles, as appropriate.

22.1.3 Maintain accountability for all personnel located in the SBCC.

22.1.4 Assist with maintaining habitability, contamination control and ALARA practices.

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

---

22.2 Principal Working Relationships

TSC Manager, Assistant EOF Manager, Offsite Radiation Protection Coordinator,  
Security Coordinator

23.0 OFFSITE RADIATION PROTECTION COORDINATOR

23.1 Responsibilities

23.1.1 Direct the activities of the OSRPF and Field Monitoring Teams (FMTs) in support of the EOF.

23.1.2 Dispatch and control of FMTs:

- a. Obtaining direct radiation, particulate, gas, and iodine samples.
- b. Obtaining field environmental samples of air, water, and vegetation;

23.1.3 Implement monitoring, decontamination, and safety plans for personnel/vehicles evacuated from the site.

23.1.4 Coordinate and monitor facility habitability.

23.2 Principal Working Relationships

Dose/PAR Coordinator, Field Team Leader, SBCC Survey Leader, Rad/Chem Coordinator, Offsite Assembly Area Coordinator

24.0 OPERATIONS COORDINATOR

24.1 Responsibilities

24.1.1 Assist the TSC Manager in setting priorities of TSC activities in support of the Control Room.

24.1.2 Monitor event classifications, radiological release status, and provide recommendations to the TSC Manager and Emergency Director.

24.1.3 Ensure critical safety functions are being monitored and trended.

24.1.4 Coordinate the use of SAMGs in the Control Room and TSC with the Engineering Coordinator.

24.1.5 Analyze problems associated with the operations of plant systems and equipment.

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

---

24.2 Principal Working Relationships

Shift Manager, Emergency Director ~~TSC Manager~~, OSC Coordinator

25.0 OPERATIONS LEADER

25.1 Responsibilities

- 25.1.1 Prepare, brief, and dispatch reentry teams on job scope, safety, and hazardous conditions.
- 25.1.2 Analyze operations problems and develop plans for monitoring and controlling plant problems.
- 25.1.3 Provide directions to individuals assigned to maintain reentry team radio communications and dispatched reentry team status.
- 25.1.4 Assist with development of work scope packages and modifications.

25.2 Principal Working Relationships

Reentry Team Coordinator, Reentry Teams

26.0 OPERATIONS SUPPORT CENTER COORDINATOR

26.1 Responsibilities

- 26.1.1 Ensure the OSC priorities and reentry teams are in direct support of the Control Room and TSC.
- 26.1.2 Direct dispatch of reentry teams as required for search and rescue, fire fighting, emergency repairs and damage assessment.
- 26.1.3 Assess OSC effectiveness and support the Reentry Team Coordinator as necessary.

26.2 Principal Working Relationships

Operations Coordinator, TSC Manager, Reentry Team Coordinator, Rad/Chem Coordinator

27.0 PLANT STATUS MONITOR

27.1 Responsibilities

- 27.1.1 Serve as a resource for plant and local environment data for event monitoring at the TSC and EOF.

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

---

29.1.7 Offsite dose assessments ~~in support of~~ until the EOF, ~~if necessary~~ is activated.

29.1.8 Assist with development of plant procedures to process and control liquid, gaseous, and solid wastes.

29.2 Principal Working Relationships

Rad/Chem Monitor, Chemistry Leader, Dose/PAR Coordinator, Emergency Director  
~~TSC Manager~~, Radiation Protection Leader

30.0 RAD/CHEM MONITOR

30.1 Responsibilities

30.1.1 Assist the Rad/Chem Coordinator in assessment of onsite radiological conditions and communicating plant and facility habitability.

30.1.2 Maintain Systems/RMS status board in the TSC and provide assistance with the plant maps in the OSC.

30.2 Principal Working Relationships

Rad/Chem Coordinator, Radiation Protection Leader

31.0 RADIATION PROTECTION LEADER

31.1 Responsibilities

31.1.1 Prepare, brief, and dispatch reentry teams on job scope, safety, hazardous conditions, and radiological concerns.

31.1.2 Implement appropriate radiation protection support of all onsite activities.

31.1.3 Analyze radiation protection problems and develop plans for monitoring and controlling plant problems.

31.1.4 Manage radiological controls for post-accident sampling of containment atmosphere and reactor coolant system.

31.1.5 Maintain habitability, contamination control and ALARA practices within the TSC/OSC.

31.1.6 Ensure plant maps in the OSC are maintained with current radiological data and hazardous environments in the plant.

31.2 Principal Working Relationships

Reentry Team Coordinator, Rad/Chem Coordinator, Reentry Teams

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

---

34.0 RESOURCE COORDINATOR

34.1 Responsibilities

34.1.1 Support the emergency with onsite and offsite procurement needs, including:

- a. Staffing levels for response and recovery.
- b. Emergency equipment for emergency or recovery support.
- c. Communications equipment.
- d. Emergency facility supplies and equipment.
- e. Vendor and Contract support.

34.1.2 Utilize Emergency Preparedness Letters of Agreements as needed.

34.1.3 Establish and maintain communications with various private and federal offsite agencies in the event of an emergency, as needed; (e.g., PSCW, INPO, A&E, NSSS).

34.2 Principal Working Relationships

Assistant EOF Manager, TSC Manager

35.0 SBCC SURVEY LEADER

35.1 Responsibilities

35.1.1 Ensure habitability of the SBCC by the issuance of dosimetry, monitoring compliance with contamination control practices, and performing radiological and smear surveys.

35.1.2 Monitoring and decontamination of vehicles and personnel entering and leaving the exclusion area.

35.2 Principal Working Relationships

Offsite Radiation Protection Coordinator, Offsite Assembly Area Coordinator

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

---

36.0 SECURITY COORDINATOR

36.1 Responsibilities

- 36.1.1 Ensure the safety of plant, visitors, contractor, and security personnel.
- 36.1.2 Direct the onsite Security personnel in maintaining the plant security program in support of the emergency situations and recovery operations.
- 36.1.3 Direct the coordination of personnel accountability and release from the site, plus restricting access to secured areas.
- 36.1.4 Coordinate security escorts of reentry teams as appropriate.
- 36.1.5 Coordinate onsite and offsite access to the plant as appropriate.

36.2 Principal Working Relationships

TSC Manager, EOF Manager, Assistant EOF Manager, Offsite Assembly Area Coordinator

37.0 SRC COMMUNICATOR

37.1 Responsibilities

- 37.1.1 Ensuring the State of Wisconsin State Radiological Coordinator (SRC) has adequate information to assist them in implementing offsite emergency plans.
- 37.1.2 Immediately informing the SRC of changes in emergency classification, radiological release status, or changes in protective action recommendations.
- 37.1.3 Providing plant and radiological status updates to the SRC.

37.2 Principal Working Relationships

Dose/PAR Coordinator, State of Wisconsin SRC

38.0 STATE LIAISON

38.1 Responsibilities

- 38.1.1 Respond to State EOC personnel questions regarding forms transmitted, classifications, PARs, and nuclear terminology.
- 38.1.2 Work in parallel with the state and EOF to ensure that they are receiving accurate and timely utility information.



EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

---

38.2 Principal Working Relationships

State of Wisconsin EOC Director and SRC, State/County Communicator,  
SRC Communicator

39.0 STATE/COUNTY COMMUNICATOR

39.1 Responsibilities

39.1.1 Ensuring the state and counties have adequate information to assist them in implementing offsite emergency plans.

39.1.2 Immediately informing the state and counties of changes in emergency classification, radiological release status, or in protective action recommendations.

39.1.3 Providing plant and radiological status updates to the state and counties.

39.2 Principal Working Relationships

ERF Communicator-EOF, State and Counties EOC Directors, State and County Liaisons

40.0 EMERGENCY DIRECTOR ~~TSC MANAGER~~

40.1 Responsibilities

40.1.1 Direct ~~all~~ onsite emergency response in support of the Control Room by assuming the responsibility of:

a. ~~Onsite protective actions~~ Approval of classification/re-classification of emergencies.

b. Onsite protective actions

c. Onsite radiological assessment

d. NRC (ENS) Communications

e. Assembly, accountability, and evacuation of personnel

f. Authorizing the use of potassium iodide (KI)

g. Authorizing emergency radiation exposures in excess of 10 CFR 20 limits or in excess of maximum NextEra Energy Point Beach yearly administrative level.

40.1.2 ~~Implement onsite operating procedures and EPIP's in support of the emergency response.~~

40.1.3 ~~Evaluate changes in plant critical safety function areas, fission product barrier status, and classification changes.~~

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

---

40.1.4 ~~Resolve questions concerning plant licensing requirements with the NRC.~~

40.2 Principal Working Relationships

~~Emergency Director~~, EOF Manager, Assistant EOF Manager, TSC Manager, Shift Manager, Operations Coordinator, Engineering Coordinator

41.0 TSC MANAGER

41.1 Responsibilities

- 41.1.1 Implement onsite operating procedures and EPIP's in support of the emergency response.
- 41.1.2 Evaluate changes in plant critical safety function areas, fission product barrier status, and classification changes.
- 41.1.3 Resolve questions concerning plant licensing requirements with the NRC.

41.2 Principal Working Relationships

Emergency Director, Assistant EOF Manager, EOF Manager

42.0 ERF COMMUNICATOR-EOF

42.1 Responsibilities

- 42.1.1 Maintaining a continuous communications flow between the EOF, TSC, Control Room, and JPIC to monitor:
  - a. Event classification, radiological release status, and Protective Action Recommendations
  - b. Plant and equipment status
  - c. Onsite radiological information
  - d. Procedures in use
  - e. Major activities and decisions within each facility
- 42.1.2 Monitor data points and trends which could result in an event classification change.

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

---

42.2 Principal Working Relationships

EOF Manager, Assistant EOF Manager, ERF Communicators-CR/TSC/JPIC

43.0 ERF COMMUNICATOR-CR

43.1 Responsibilities

43.1.1 Maintaining a continuous communications flow between the Control Room, TSC, EOF, and JPIC and to monitor:

- a. Event classification, radiological release status, and Protective Action Recommendations
- b. Plant and equipment status
- c. Onsite radiological information
- d. Procedures in use
- e. Major activities and decisions within each facility

43.1.2 Monitor data points and trends which could result in an event classification change.

43.2 Principal Working Relationships

Shift Manager, ERF Communicators-TSC/EOF/JPIC

44.0 PLANT SPOKESPERSON

44.1 Responsibilities

44.1.1 Attend media briefings to address public concerns.

44.1.2 Liaison and communication between the emergency response organization and other corporate departments affected by the emergency or whose services are required to support the response.

44.1.3 Approve news statements.

44.2 Principal Working Relationships

Emergency Director, EOF Manager, Assistant EOF Manager, JPIC Manager

**ENCLOSURE 1, ATTACHMENT 2**

**NEXTERA ENERGY POINT BEACH, LLC  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2**

**LICENSE AMENDMENT REQUEST 277  
REVISION TO STAFF AUGMENTATION TIMES IN THE  
PBNP EMERGENCY PLAN**

**CLEAN COPY PAGES OF EMERGENCY PLAN APPENDIX A  
AND SECTIONS 5.0, 6.0, 7.0**

ORGANIZATIONAL CONTROL OF EMERGENCIES

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In the event of an Alert or higher classification level, the SM orders the activation of the TSC, OSC, EOF, OSRPF and JPIC. The on-site ERO is directed by the TSC Emergency Director. The EOF Manager in the EOF provides overall coordination of the event and direction of the ERO.

If the SM determines that an Alert or higher emergency exists, the on-shift staff will assume an emergency mode of operation and the remaining ERO shall be activated. Initially, the on-shift staff will be augmented by critical positions that are designated in Table 5.1. The goal is to accomplish this augmentation within 60 minutes for the TSC, OSC and OSRPF and 90 minutes for the EOF such that activation of TSC will be within 60 minutes and the EOF will be within 90 minutes.

The SM will direct plant response, assess and control the emergency, and initiate the required plant and offsite notifications in accordance with Figures 5-6 and 5-7. If the SM is incapacitated, an Operating Supervisor (OS) will assume the responsibility and authority of the SM (until relieved by a qualified individual) and coordinate the plant response, including the initiation of offsite notifications.

### 3.1 On-Shift Emergency Organization (B-1)

Each operating shift is shown in Figure 5-2 and consists of the following positions:

- 3.1.1 The SM, who holds a Senior Reactor Operator (SRO) license, is in direct charge of all plant operations during their assigned shift and is directly responsible for actions of the crew. The SM will be in the Control Room and maintain responsibility for operation of plant equipment and controls during emergency conditions other than fires. The SM's emergency classification will be determined by the Emergency Action Levels (EALs) in Appendix B. The SM will assume the responsibility of the Emergency Director (ED) and continue to assess the emergency until relieved of this responsibility by a qualified ED. If the incident is classified as an Alert or higher, the appropriate emergency response facilities as shown in Figures 5-3 through 5-5 will be activated.
- 3.1.2 Two OSs hold SRO licenses. The OSs report to the SM in the Control Room. The OSs perform initial assessment and evaluation of any abnormalities or emergency conditions. After the SM declares an emergency, the OSs maintain the normal duties of directing the Control Operators (COs) and the Auxiliary Operators (AOs).
- 3.1.3 Four COs hold Reactor Operator (RO) or SRO licenses. The COs report to the OSs and conduct the safe and proper operation of the unit at all times, and respond to emergency conditions, as necessary. One CO activates the Emergency Response Data System (ERDS) at Alert or higher classification.

ORGANIZATIONAL CONTROL OF EMERGENCIES

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3.2 Technical Support Center (TSC) and Operations Support Center (OSC) Organizations

The TSC & OSC Organizations are located on-site and illustrated in Figure 5-3.

Upon activation of the TSC, the Emergency Director will assume overall responsibility for the emergency response and for all onsite activities and personnel not directly related to plant operation. The Emergency Director will coordinate activities involving the Control Room, TSC, OSC, and Security Building. Responsibility for classification, notification, protective action recommendations, assessment and evaluation will be transferred from the SM. The Operations Coordinator will assume responsibility for assessment and evaluation of the plant condition. Onsite radiation surveys and monitoring will be conducted under the direction of the Rad/Chem Coordinator. The Operations Support Center Coordinator will assume responsibilities for maintenance and repair coordination and search and rescue. An evacuation, or an assembly and subsequent evacuation, shall be ordered upon the classification of an Alert or higher. Reference EP 6.0, Emergency Measures, for additional details. TSC & OSC ERO assignments, by title, responsibilities, and principle working relationships are listed in Appendix A.

3.3 Emergency Operations Facility (EOF) & Offsite Radiation Protection Facility (OSRPF) Organizations

The EOF & OSRPF Organizations are located near-site and illustrated in Figure 5-4.

Upon activation of the EOF, the EOF Manager will assume overall responsibility for the emergency response and recovery.

Responsibility for offsite emergency response functions including notification, dose assessment, protective action recommendations, and recovery will be transferred from the ED. Offsite radiation surveys will be initiated as necessary from the OSRPF under the coordination of the Offsite Radiation Protection Coordinator. These surveys will be under the direction of the Dose/PAR Coordinator in the EOF. A liaison will be provided to state and local government agencies Emergency Operations Centers (EOCs) to assist in communications. EOF & OSRPF ERO assignments, by title, responsibilities, and principle working relationships are listed in Appendix A.

Additional actions may require extensive amounts of external resources. To ensure this, corporate headquarters may be contacted to provide or assist with offsite technical support.

Other personnel also report to the TSC and EOF to assist in the emergency response operations. Additional personnel will provide logistic, administrative, and scheduling support. These personnel will ensure 24-hour continuity for minimum staff positions.

### 3.4 Joint Public Information Center (JPIC)

The JPIC will activate to provide periodic updates to the media and public.

The JPIC Organization is illustrated in Figure 5-5.

## 4.0 OFFSITE EMERGENCY ORGANIZATION

This section describes offsite supporting assistance available to the onsite staff emergency response organization.

### 4.1 Corporate Support

Most ERO positions are filled by personnel assigned to NextEra Energy Point Beach. The NextEra Energy Point Beach normal operations staffing, as shown in Figure 5-1 has available the technical and administrative support services of the corporate offices. The EOF Manager will identify situations where additional assistance is needed and will relay the emergency assistance information to corporate management for evaluation.

Corporate will provide or obtain assistance for the onsite emergency organization as required. These responsibilities include, but are not limited to:

- 4.1.1 Providing senior company management support to the plant emergency organization.
- 4.1.2 Providing funds necessary to implement the NextEra Energy Point Beach Emergency Plan.
- 4.1.3 Providing contract security management direction and support for offsite facilities.
- 4.1.4 Coordinating the restoration and/or operation of all generation, transmission, and distribution facilities.
- 4.1.5 Monitoring reentry and/or recovery operations, post-accident planning, and assisting as requested.
- 4.1.6 Assisting with post-accident investigation and review responsibilities.
- 4.1.7 Providing general assistance for environmental monitoring.

ORGANIZATIONAL CONTROL OF EMERGENCIES

8.0 BASES

B-1 PBNP Staffing Analysis performed and approved on 11/06/2013 (Rev 2) in accordance with NEI 10-05 (Rev 0), Assessment of On-Shift Emergency Response Organization Staffing Capabilities.

TABLE 5.1  
Minimum Staffing For Emergencies (B-1)

MAJOR FUNCTIONAL AREA	ON SHIFT STAFFING	
	POSITION/FUNCTION TITLE	Staffing
Plant Operations and Assessment of Operational Aspects	Shift Manager (SM)	1
	Operating Supervisor (OS)	2
	Control Operators (CO)	4
	Auxiliary Operators (AO) (1 FBL + 2 FBM) (Note 1)	5
	Shift Technical Advisor (STA)	1
Notification/ Communications	Communicator	Note 2
	Security Shift Supervisor (SSS) (State and Local Notifications)	1
Support Staff	Radiochemistry Technician	1
	Radiation Protection Technologist	1
Fire Brigade	Additional FBMs and/or AOs (Note 1)	2
TOTALS		18

FBL -- Fire Brigade Leader FBM -- Fire Brigade Member

Note 1: Total staffing for AOs/FBMs is 7. This includes a minimum of 5 AOs plus 2 additional FBMs which may be AOs.

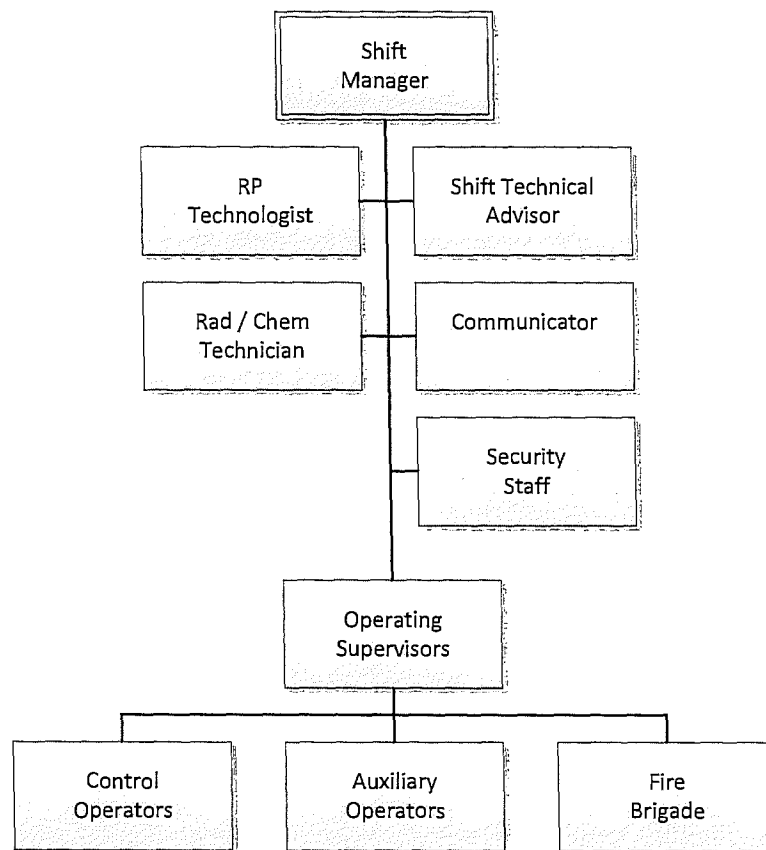
Note 2: This position may be filled by the OS, AO, or STA.

MAJOR FUNCTIONAL AREA	AUGMENTATION STAFFING		
	POSITION TITLE	60 MINUTES	90 MINUTES
Emergency Direction and Control	Emergency Director (TSC)	1	
	TSC Manager	1	
	EOF Manager		1
	Assistant EOF Manager		1
	EAL Monitor	1	
Plant System Engineering / Repair and Corrective Actions Protective Actions	Operations Coordinator	1	
	Engineering Coordinator	1	
	OSC Coordinator	1	
	Rad/Chem Coordinator (Dose Assessment)	1	
	Operations Leader (OSC)	1	
	Radiation Protection Leader (OSC)	1	
	I&C Leader (OSC)	1	
	Mechanical or Electrical Leader (OSC)	1	
	Chemistry (OSC)	1	
	Resource Coordinator (EOF)		1
	Dose/PAR Coordinator (EOF)		1
	OSRPF Coordinator	1	
	Field Team Leader	1	
	Field Monitoring Team #1	1	
	Field monitoring Team #2	1	
Communications	ERF Communicator (TSC)	1	
	ERF Communicator (EOF)		1
	ENS Communicator (TSC)	1	
	State/County Communicator (EOF)		1
TOTALS		18	6



ORGANIZATIONAL CONTROL OF EMERGENCIES

FIGURE 5-2  
ON-SHIFT EMERGENCY ORGANIZATION



ORGANIZATIONAL CONTROL OF EMERGENCIES

FIGURE 5-3  
TECHNICAL SUPPORT CENTER (TSC) AND OPERATIONS SUPPORT CENTER (OSC)

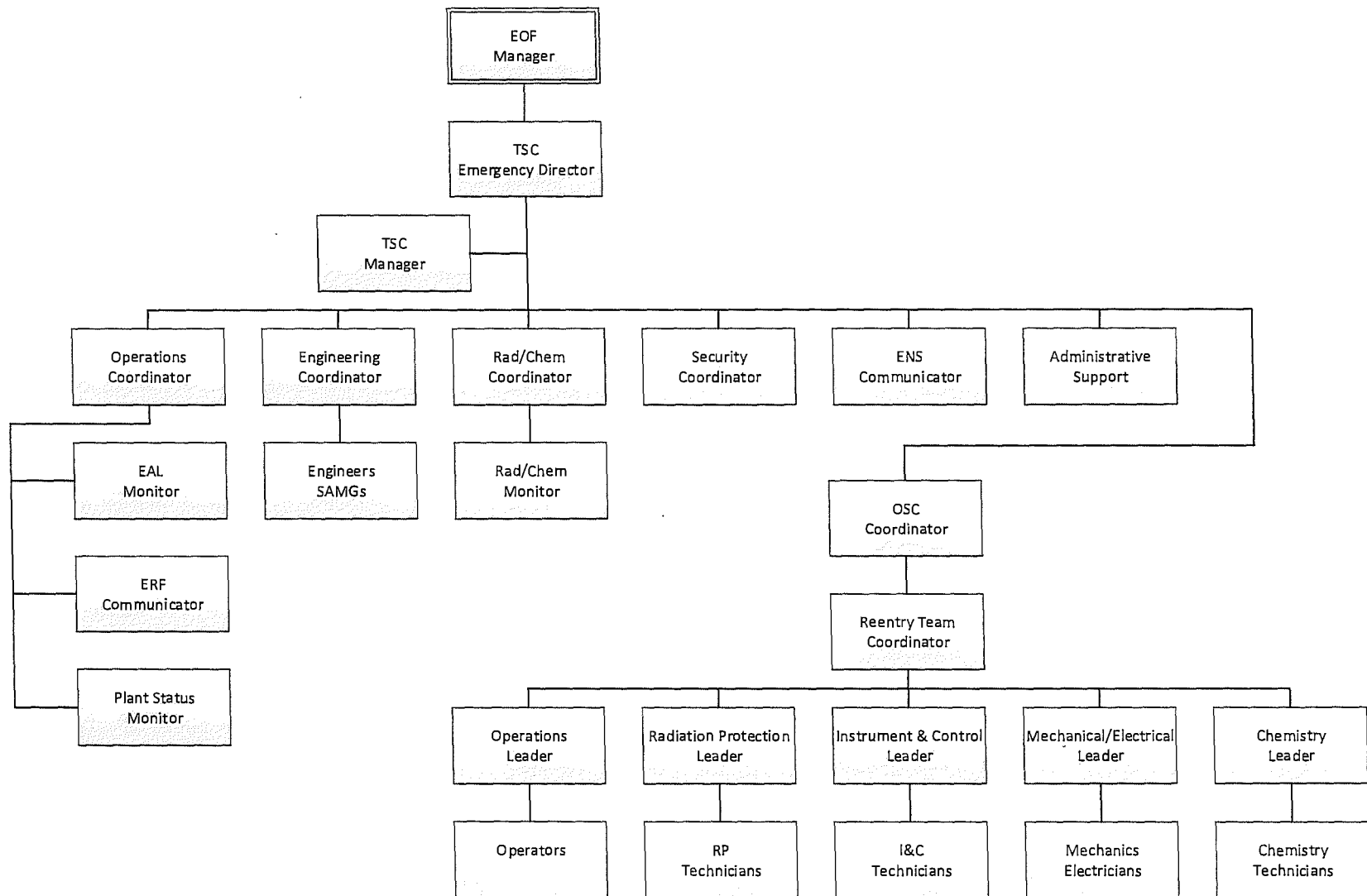


FIGURE 5-4  
EMERGENCY OPERATIONS FACILITY (EOF) AND OFFSITE RADIATION PROTECTION FACILITY (OSRPF)

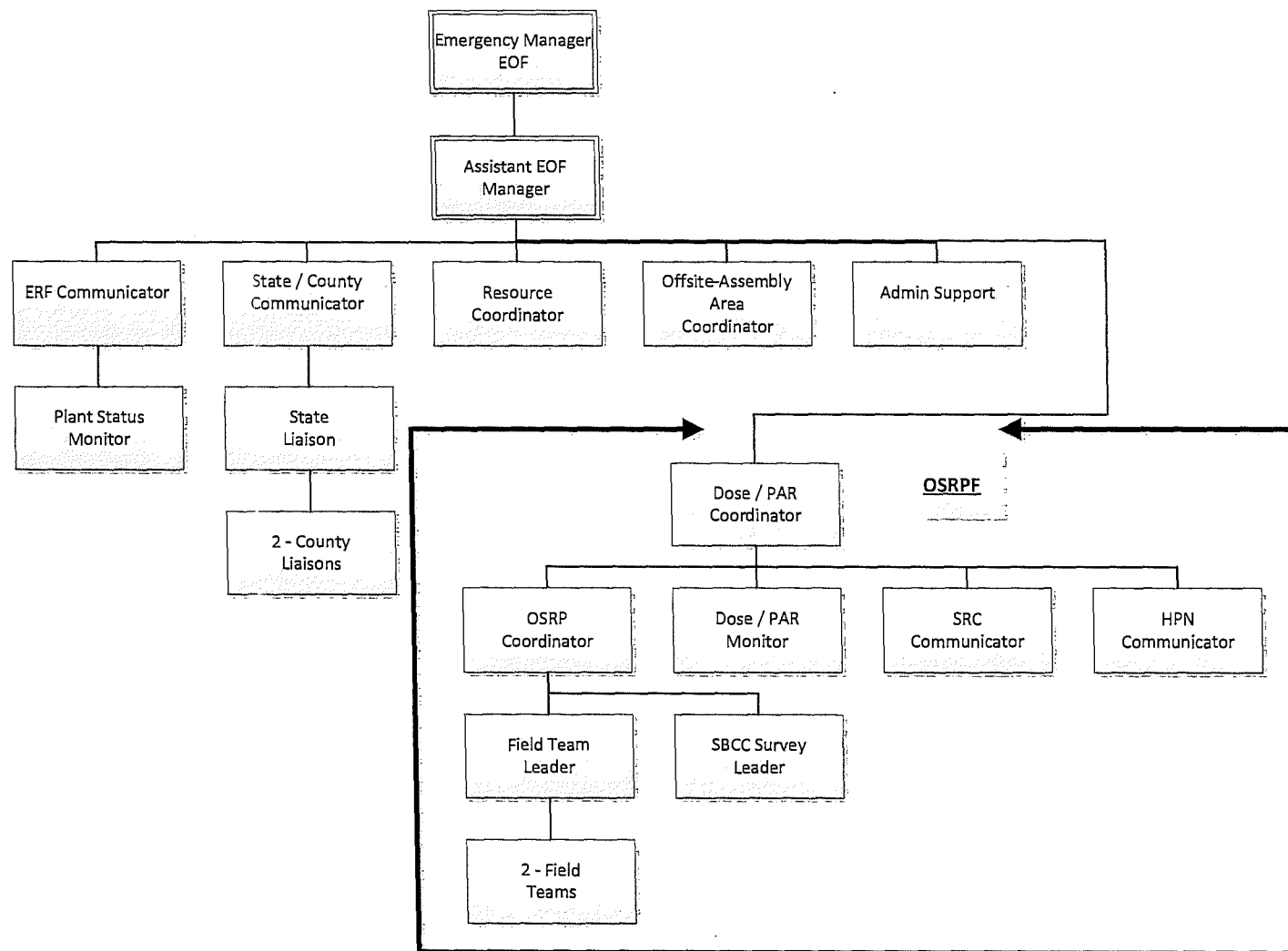
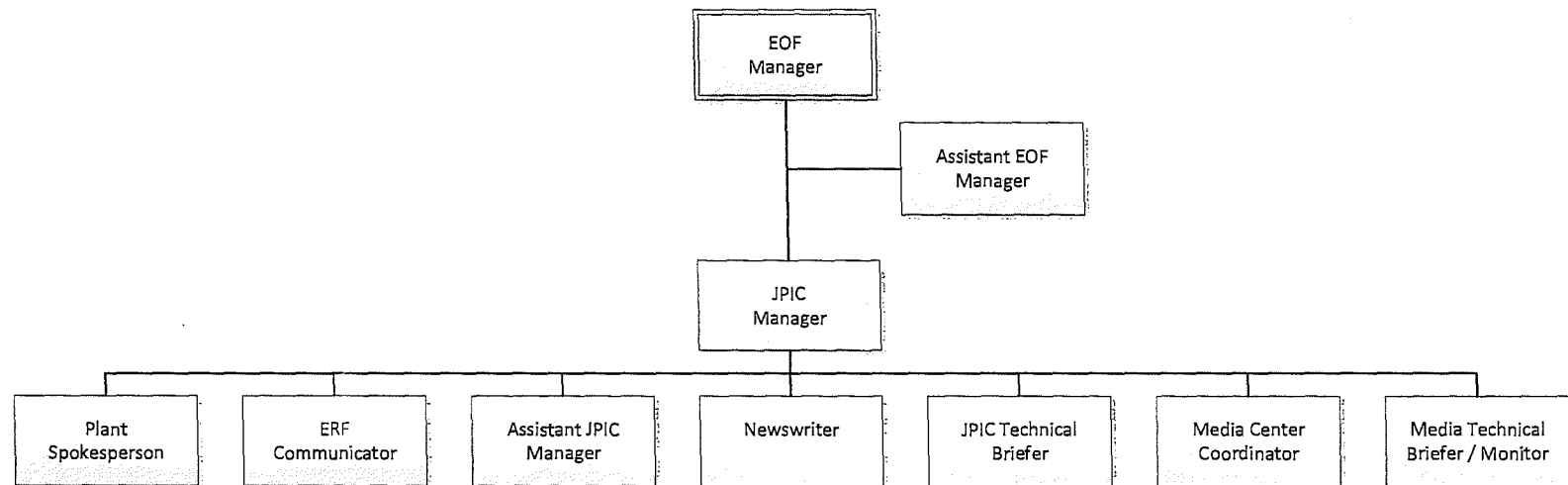
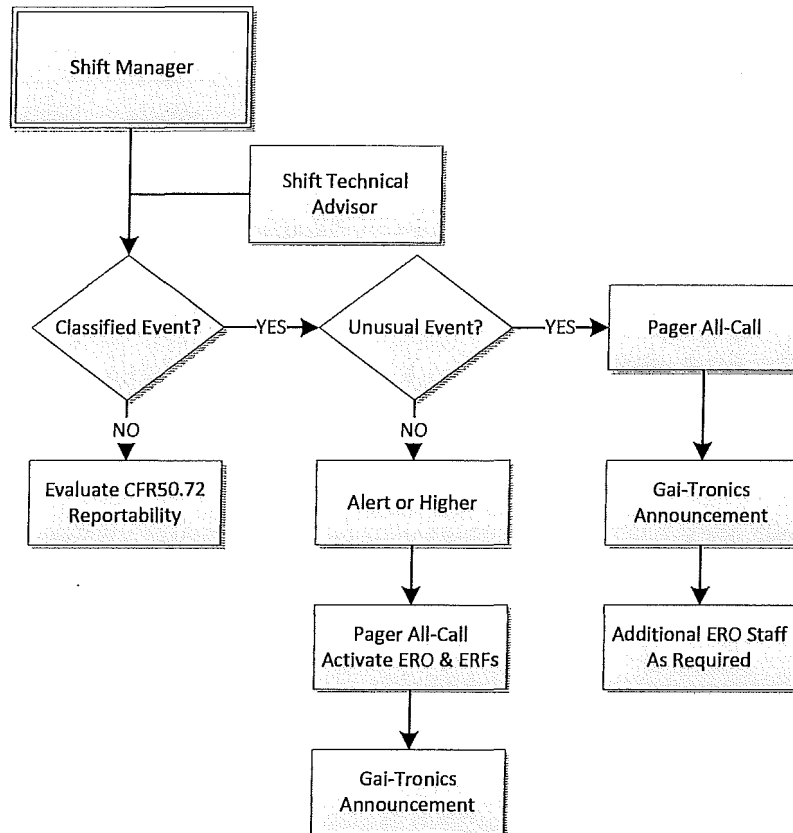


FIGURE 5-5  
JOINT PUBLIC INFORMATION CENTER (JPIC)



ORGANIZATIONAL CONTROL OF EMERGENCIES

FIGURE 5-6  
EMERGENCY NOTIFICATION SEQUENCE



### 3.2 Damage Control and Repair

For minor emergencies, the plant personnel will normally be able to handle the cleanup, repair, and damage control. For major emergencies, the support of other company personnel or specialized outside contractors may be required to assist in the damage control, cleanup, and repair operation. Emergency response operations will be handled with the assistance of agencies available for that purpose.

Personnel exposure to radiation and radioactive materials during corrective actions should be controlled as stipulated in EP 6.0, Section 5.1.

## 4.0 PROTECTIVE ACTIONS

The EPIP used in classifying emergencies has predetermined EALs that, when met or exceeded, will require protective actions to be taken. In addition, the Shift Manager may initiate EPIPs when they are determined to be necessary. EPIPs include assessment actions, corrective actions, and protective actions as appropriate.

Protective actions will ensure that personnel, both on and offsite, will be notified and actions initiated for their protection in the event radiation or airborne activity levels from a radiological emergency onsite exceed or are predicted to exceed predetermined values, or when other situations threaten personnel safety.

Protective actions taken within the exclusion and protected area (onsite) are the responsibility of the SM and TSC Emergency Director with input from the Operations Coordinator, while those taken offsite fall under the jurisdiction of Wisconsin Emergency Management with the resources of the State Division of Health and Family Services, Radiation Protection Unit, and the Manitowoc and Kewaunee County Emergency Managements. Recommendations of protective actions to be taken offsite will be made only by the EOF Emergency Manager. It is recognized that at the beginning of an emergency evolution, the Shift Manager will have the responsibility and authority of the Emergency Director until relieved.

Operations Department Abnormal Operating procedures (AOPs) contain specific instructions for the notification of protective actions for onsite personnel during hostile action-based events.

### 4.1 Protective Actions, Evacuation, and Personnel Accountability

This subsection provides for the timely relocation of individuals to prevent or minimize exposure to direct or airborne radiation or toxic/flammable gas intrusion.

#### 4.1.1 Exclusion Area

##### a. Action Criteria

Protective actions for personnel onsite shall be taken when a radiological emergency has occurred, or may occur, which will result in concentrations of airborne activity or radiation levels that exceed normal limits for a specific area or areas and cannot be readily controlled. In addition, protective actions shall be taken for onsite personnel in such situations as toxic/flammable gas intrusion, fire, meteorological danger, etc., where personnel safety is threatened.

d. Assembly and Evacuation

Personnel assembly, and evacuation at NextEra Energy Point Beach will depend on the nature of the emergency and the extent of the area affected. The Shift Manager, or the TSC Manager if the TSC is activated, shall initiate any limited evacuation or full-site assembly, and/or evacuations. These protective actions shall be made after careful consideration of the benefits and risks involved. The details of these protective actions are included in the EPIPs. In general, these protective actions shall be in accordance with the following:

1. A limited evacuation (withdrawal of personnel from affected portion(s) of the plant) shall be considered when any of the following conditions exist:
  - (a) Unscheduled area radiation monitor high-level alarm.
  - (b) Conditions which indicate a valid containment high-flux-at-shutdown alarm is necessary.
  - (c) Unevaluated airborne radioactive concentrations in excess of the derived air concentrations (DACs) specified in Appendix B to 10 CFR 20.
  - (d) Excessive radioactive surface contamination levels.
  - (e) Other emergency conditions, such as fire, or toxic/flammable gas intrusion that may endanger human life or health.

The criteria for these radiation levels, alarms and conditions do not apply to anticipated increases or alarms resulting from planned operations.

When a limited evacuation is ordered, personnel in the room, area, or building will proceed as directed. If evacuation is from areas within the RCA, personnel will proceed to the RP station for accountability and contamination monitoring.

If a hazard continues to increase in severity or spreads to other areas, and the Shift Manager or TSC Emergency Director deems it necessary, an evacuation or an assembly and subsequent evacuation may also be ordered.

2. An evacuation, or an assembly and subsequent evacuation shall be ordered upon the classification of an Alert or higher.

EMERGENCY MEASURES

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6. At the discretion of the TSC Emergency Director, the assembled non-ERO personnel may be evacuated from the site when chemical, radiological, or meteorological conditions allow, or if conditions warrant, take additional actions, such as radiological monitoring and relocation.
7. Evacuation of a specific emergency response facility (ERF) will be considered when habitability or function of that facility is questionable

e. Personnel Accountability

Assembly and Evacuation actions are contained in Step 4.1.1.d and Table 6-2. Personnel accountability shall be conducted at an Alert classification or higher. Accountability is the responsibility of the Shift Manager or TSC Emergency Director, in conjunction with the Security Coordinator. During an emergency situation that requires personnel in the plant to assemble in the various assembly areas, management personnel should help ensure that all their personnel are accounted for.

Accountability, within the Protected Area of the plant, should take no longer than 30 minutes from the time of the announcement. The Security Shift Supervisor will verify complete accountability using the security computer or the manual accountability procedure, and will forward this information to the TSC Emergency Director. If the TSC is not activated, this information will be forwarded to the Shift Manager. If personnel are unaccounted for, teams will be dispatched to locate and, if necessary, rescue the personnel. Personnel accountability procedures are included in the EPIPs.

Accountability outside the Protected Area is accomplished by Security physically entering the plant buildings to check for personnel. Aid to affected personnel will be provided as specified in Section 6.0.

f. Radiological Monitoring of Personnel Evacuated from Site

Requirements for external radiation exposure monitoring are contained in Section 5.0. A combination of checking SRDs/EPDs, if worn, and questioning of evacuees will be used to determine if there were any significant external exposures received prior to evacuation. Section 6.0 addresses appropriate actions for any known or suspected overexposures.

If normal contamination monitoring is not possible, monitoring for contamination and internal exposure at the OSRPF and OSC shall be accomplished by using portable instrumentation, as necessary. Any persons suspected or known to have ingested or inhaled radioactive material will be whole body counted to assess internal exposure as soon as conditions permit.



#### 4.1.2 Offsite Area (Area Beyond the Exclusion Area)

##### a. Dose Projections (Reference 7.7)

Dose projections may be performed by a software application using meteorological information, plant parameters, and a dose assessment process to perform real time dose assessments during an inadvertent release of radioactive materials. Terminals for completing dose projections are located in the Control Room, TSC, EOF, and Alternate EOF. Meteorological data is stored and processed in the Plant Process Computer System (PPCS/PI) as described in EP Appendix L. Radiological effluent monitoring data is also available from PPCS/PI and may be manually entered into the dose assessment program. With meteorological and effluent release data available, calculations of atmospheric dispersion and offsite radiation dose from the plume can be made. Dose calculations are made for Total Effective Dose Equivalents (TEDE) and Thyroid Committed Dose Equivalents (Thyroid CDE). Calculation results can be printed in report format. Projected calculations take into account values of time of release and duration of release. The dose assessment computer allows accident dose calculations to be made before results from the offsite Field Monitoring Teams are received. Manual calculation methodologies for offsite dose calculations are available in case of computer system failures.

Field Monitoring Team results may be used to verify the dose calculations. Field Monitoring Teams will conduct a search for the plume, obtain dose rates, and sample at pre-designated sample locations as described in EP Appendix C.

The Dose/PAR Coordinator or the Rad/Chem Coordinator may determine the applicable dose rates in the EPZ and calculate an estimated total population dose. The EOF Emergency Manager shall ensure that radiological information and recommendations for protective actions are transmitted to the offsite authorities.

## 1.0 DISCUSSION

This section of the Emergency Plan identifies, describes, and gives locations of emergency operation centers, support centers, communication systems, and first-aid and medical facilities. EP Appendix M, Matrix for Emergency Preparedness Equipment, also provides a snapshot of Emergency Preparedness related equipment, including the location, purpose, and regulatory requirement of such equipment. This appendix was developed as a NextEra Energy Point Beach Excellence Plan Confirmatory Action Letter (CAL) commitment. (B-3)

## 2.0 CENTERS FOR EMERGENCY OPERATIONS

The Emergency Response Facilities (ERFs) are coordinated centers, separated physically to minimize interference and confusion, and connected by dedicated communications lines to ensure an uninterrupted flow of information. Figure 7-1 shows the emergency communications network that will allow coordination of all phases of the emergency response operations.

### 2.1 Emergency Operations Facility (EOF) (See EP 2.0)

The EOF is located at the Site Boundary Control Center (SBCC) with an alternate location at 3060 Voyager Drive, Green Bay, WI. Communications links will be maintained with the TSC, JPIC, OSRPF, and corporate offices, designated offsite federal and state agencies, and offsite field monitoring teams. Up to 700 sq. ft. can be made available to accommodate state and local agency personnel.

This facility, under the direction of the EOF Manager, is the focal point for overall NextEra Energy Point Beach emergency response and is the location of primary interface between NextEra Energy Point Beach and offsite agencies. This facility will be activated by plant personnel within 90 minutes of the declaration of an Alert or higher classification. Comprehensive coordination is achieved by:

- 2.1.1 The EOF Manager is located in this facility and responsible for the overall management of the emergency response and recovery operations for the NextEra Energy Point Beach.
- 2.1.2 Maintaining communication links with the other Emergency Response Facilities (ERFs) and receiving periodic updates of the progress of the emergency procedures.
- 2.1.3 Providing a single contact point for state and local emergency response agencies and providing timely, accurate information.
- 2.1.4 Coordinating the transfer of injured personnel who are radiologically contaminated and need treatment by local health care personnel.
- 2.1.5 Providing for offsite radiological surveys including transportation, equipment, and personnel.

EMERGENCY FACILITIES AND EQUIPMENT

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- 2.1.6 Act as focal point for security and traffic control.
- 2.1.7 Act as focal point for technical review of information released to the media.
- 2.1.8 Disseminating information to the corporate personnel for technical and administrative support.
- 2.1.9 Managing recovery operations of an emergency (long-term staffing, scheduling, and expediting).
- 2.1.10 Implement Quality Control program for construction and repair tasks that may be necessary.
- 2.1.11 Primary interface between outside organizations, responding vendors and contractors.
- 2.1.12 Monitor meteorological data, plant conditions and data.

2.2 Offsite Radiation Protection Facility (OSRPF) (See EP 2.0)

The radiation protection operation of the SBCC is the responsibility of the Offsite Radiation Protection Coordinator who reports to the Dose/PAR Coordinator at the EOF. The facility will be activated by plant personnel within one hour of an Alert or higher classification. This portion of the SBCC provides:

- 2.2.1 Personnel accountability, contamination monitoring, and a decontamination point for evacuated visitors, plant and contractor personnel.
- 2.2.2 A radiation protection (RP) control point for individuals entering or leaving the site.
- 2.2.3 A central point for offsite radiological field monitoring teams, with an alternate location from the Technical Support Center (TSC)/Operations Support Center (OSC).

2.3 Technical Support Center (TSC) (See EP 2.0)

The TSC is located on El. 8' of the Admin Building. There are direct communication links with the Control Room, OSC, and EOF.

This facility, under the direction of the TSC Emergency Director coordinates all onsite emergency response. This facility will be activated by plant personnel within one hour of the declaration of an Alert or higher classification. This facility provides:

- 2.3.1 The primary communications link between the Control Room, OSC, and EOF.

**TABLE OF CONTENTS**

<b>SECTION</b>	<b>TITLE</b>	<b>PAGE</b>
1.0	ADMINISTRATIVE SUPPORT LEADER.....	5
2.0	ASSISTANT EOF MANAGER.....	5
3.0	CHEMISTRY LEADER.....	6
4.0	COUNTY LIAISON.....	6
5.0	DOSE/PAR COORDINATOR.....	7
6.0	DOSE/PAR MONITOR.....	7
7.0	SHIFT MANAGER.....	8
8.0	SHIFT TECHNICAL ADVISOR (STA).....	8
9.0	EAL MONITOR.....	9
10.0	ELECTRICAL LEADER.....	9
11.0	ELECTRICAL/I&C ENGINEER.....	9
12.0	ENGINEERING COORDINATOR.....	10
13.0	ENS COMMUNICATOR.....	10
14.0	EOF MANAGER.....	11
15.0	ERF COMMUNICATOR-TSC.....	12
16.0	FIELD TEAM LEADER.....	12
17.0	HPN COMMUNICATOR.....	13
18.0	I&C LEADER.....	13
19.0	JPIC MANAGER.....	13
20.0	MECHANICAL LEADER.....	14
21.0	MECHANICAL SYSTEM ENGINEER.....	14
22.0	OFFSITE ASSEMBLY AREA COORDINATOR.....	14

**TABLE OF CONTENTS**

<b>SECTION</b>	<b>TITLE</b>	<b>PAGE</b>
23.0	OFFSITE RADIATION PROTECTION COORDINATOR.....	15
24.0	OPERATIONS COORDINATOR.....	15
25.0	OPERATIONS LEADER.....	16
26.0	OPERATIONS SUPPORT CENTER COORDINATOR .....	16
27.0	PLANT STATUS MONITOR.....	16
28.0	PROBABILISTIC RISK ASSESSMENT ENGINEER .....	17
29.0	RAD/CHEM COORDINATOR .....	17
30.0	RAD/CHEM MONITOR.....	18
31.0	RADIATION PROTECTION LEADER.....	18
32.0	REACTOR/CORE PHYSICS ENGINEER.....	19
33.0	REENTRY TEAM COORDINATOR.....	19
34.0	RESOURCE COORDINATOR.....	20
35.0	SBCC SURVEY LEADER.....	20
36.0	SECURITY COORDINATOR.....	21
37.0	SRC COMMUNICATOR.....	21
38.0	STATE LIAISON .....	21
39.0	STATE/COUNTY COMMUNICATOR .....	22
40.0	EMERGENCY DIRECTOR.....	22
41.0	TSC MANAGER .....	23
42.0	ERF COMMUNICATOR-EOF .....	23
43.0	ERF COMMUNICATOR-CR .....	24
44.0	PLANT SPOKESPERSON .....	24

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

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Criteria which may be considered during the selection of personnel for emergency organization positions include the qualification criteria required for normal operational job functions, the managerial and technical capabilities demonstrated in the performance of their normal administrative job functions, and completion of the appropriate emergency plan training. Onsite and offsite organizations and facility staff organization and qualifications are described in Technical Specifications Section 5.2, Administrative Controls - Organization.

The Emergency Response Organization charts and reporting structure are located in EP 5.0, Organizational Control of Emergencies.

1.0 ADMINISTRATIVE SUPPORT LEADER

1.1 Responsibilities

- 1.1.1 Provide clerical and administrative support to responding ERO personnel at the TSC, EOF and OSC.
- 1.1.2 Ensure each position has adequate office supplies, procedures, and operational equipment to perform their duties.
- 1.1.3 Coordinate records management, duplication and distribution of all documents, fax transmittals, word processing, event recording, and other office support for the emergency response facilities.

1.2 Principal Working Relationships

Resource Coordinator, TSC Manager, Assistant EOF Manager, Reentry Team Coordinator

2.0 ASSISTANT EOF MANAGER

2.1 Responsibilities

- 2.1.1 Ensure EOF has an adequate staffing level to respond to the event.
- 2.1.2 Maintain an information flow with the Control Room and TSC to establish priorities and focus.
- 2.1.3 Ensure initial and continuing communications are maintained with offsite agencies.
- 2.1.4 Interface with responding representatives from offsite emergency agencies and assist in their information and communication needs.
- 2.1.5 Maintain accountability of personnel at the EOF and assess and provide for any considerations necessary for their safety.
- 2.1.6 Fill out the Nuclear Accident Reporting System (NARS) form.

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

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2.2 Principal Working Relationships

EOF Manager, Emergency Director, TSC Manager, JPIC Manager

3.0 CHEMISTRY LEADER

3.1 Responsibilities

- 3.1.1 Prepare, brief, and dispatch reentry teams on job scope, safety, and hazardous conditions.
- 3.1.2 Setup of the OSC Chemistry facilities and provide gamma spectroscopy support at the OSRPF.
- 3.1.3 Analyze chemistry problems and secure necessary chemistry resources to assist emergency response and recovery operations.
- 3.1.4 Manages post-accident sampling of containment atmosphere and reactor coolant system.
- 3.1.5 Assist with developing work scope packages, modifications, and analyses of problems.

3.2 Principal Working Relationships

Reentry Team Coordinator, Rad/Chem Coordinator, Reentry Teams

4.0 COUNTY LIAISON

4.1 Responsibilities

- 4.1.1 Respond to County EOC personnel questions regarding forms transmitted, classifications, PARs, and nuclear terminology.
- 4.1.2 Work in parallel with the counties and EOF to ensure that they are receiving accurate and timely utility information.

4.2 Principal Working Relationships

Manitowoc and Kewaunee EOC Directors, State/County Communicator

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

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5.0 DOSE/PAR COORDINATOR

5.1 Responsibilities

- 5.1.1 Direct offsite dose assessment, provide input to classification and protective action recommendations.
- 5.1.2 Communicate periodically with the State Radiological Coordinator regarding offsite conditions, dose projections, PARs, and status updates.
- 5.1.3 Monitor facility radiological conditions and hazards.
- 5.1.4 Recommend when it is necessary to authorize dose in excess of the maximum NextEra Energy Point Beach yearly administrative level, or in excess of the 10 CFR 20.1201 limits.
- 5.1.5 Review current or potential exposures and recommend when potassium iodide should be distributed to emergency workers as a protection measure.

5.2 Principal Working Relationships

EOF Manager, Assistant EOF Manager, OSRP Coordinator, HPN and SRC Communicators, Dose/PAR Monitor

6.0 DOSE/PAR MONITOR

6.1 Responsibilities

- 6.1.1 Assist the Dose/PAR Coordinator with offsite dose assessment and development of Protective Action Recommendations (PARs).
- 6.1.2 Maintain communications with the Field Team Leader for current field monitoring team data.
- 6.1.3 Periodically obtain current weather forecasts and update the status boards as necessary.
- 6.1.4 Maintain the Rad/Met status board based upon changes in protective actions, classification, radiological release status, or significant changes in meteorology.

6.2 Principal Working Relationships

Dose/PAR Coordinator, Field Team Leader, OSRP Coordinator



EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

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7.0 SHIFT MANAGER

7.1 Responsibilities

- 7.1.1 Coordinates the safe operation of the plant, including implementation of normal and emergency procedures to safely place and maintain the plant in a safe shutdown condition.
- 7.1.2 Direct the activities of the plant Operations personnel and shift support personnel, coordinated with the OSC.
- 7.1.3 Operate the plant in compliance with all plant procedures, directives, Technical Specifications, and emergency procedures.
- 7.1.4 Provide information and recommendations on accident response.
- 7.1.5 Monitor plant parameters and plant conditions.
- 7.1.6 Onsite individual with unilateral and non-delegable authority to classify an event and provide protective action recommendations until relieved.
- 7.1.7 Interface with the emergency response organization in support of the emergency response operations.
- 7.1.8 Implement emergency response prior to relief by members of the emergency organization.

7.2 Principal Working Relationships

Emergency Director, Operations Coordinator, EOF Manager

8.0 SHIFT TECHNICAL ADVISOR (STA)

8.1 Responsibilities

- 8.1.1 Monitor Critical Safety Functions in the Control Room.
- 8.1.2 Assist with the Communicator function as assigned (not to interfere with Critical Safety Function monitoring).
- 8.1.3 Assist with Emergency Classifications, if necessary.

8.2 Principal Working Relationships

Shift Manager, Operating Supervisor

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

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9.0 EAL MONITOR

9.1 Responsibilities

- 9.1.1 Monitor plant parameters for potential changes in Emergency Action Level and Protective Action Recommendation.
- 9.1.2 Monitor and recommend changes to classification, radiological release status and Protective Action Recommendations.
- 9.1.3 Maintain the fission product barrier status board.

9.2 Principal Working Relationships

Emergency Director, TSC Manager, ERF Communicator-TSC, Plant Status Monitor, Dose/PAR Coordinator

10.0 ELECTRICAL LEADER

10.1 Responsibilities

- 10.1.1 Prepare, brief, and dispatch reentry teams on job scope, safety, and hazardous conditions.
- 10.1.2 Analyze electrical problems and develop plans for monitoring and controlling plant problems.

10.2 Principal Working Relationships

Reentry Team Coordinator, Reentry Teams

11.0 ELECTRICAL/I&C ENGINEER

11.1 Responsibilities

- 11.1.1 Analyze problems with the operation of plant systems and equipment and develop plans or modifications to mitigate any concerns.
- 11.1.2 Provide engineering support including Severe Accident Management response.

11.2 Principal Working Relationships

Engineering Coordinator

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

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12.0 ENGINEERING COORDINATOR

12.1 Responsibilities

- 12.1.1 Provide the administrative and technical oversight of any engineers.
- 12.1.2 Evaluate plant onsite power availability and preferred operating status for unaffected unit.
- 12.1.3 Direct, coordinate, and approve engineering, design and construction activities on site.
- 12.1.4 Ensure that the engineering and design activity is adequately staffed and equipped to provide timely support.
- 12.1.5 Assist in the planning, scheduling, and expediting of recovery operations.
- 12.1.6 Provide SAMG Team direction.
- 12.1.7 Analyze problems with the operation of plant systems and equipment.

12.2 Principal Working Relationships

Emergency Director, Reactor/Core Physics Engineer, PRA Engineer, Mechanical Systems Engineer, Electrical/I&C Engineer

13.0 ENS COMMUNICATOR

13.1 Responsibilities

- 13.1.1 Ensuring the NRC has adequate information.
- 13.1.2 Immediately (NOT to exceed 1 hour) informing the NRC of changes in emergency classification, radiological release status, or protective action recommendations (initial, upgrades, de-escalation, termination).
- 13.1.3 Providing plant and radiological status updates to the NRC.
- 13.1.4 Monitor the event for potential licensing concerns.

13.2 Principal Working Relationships

Emergency Director, NRC via ENS

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

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14.0 EOF MANAGER

14.1 Responsibilities

- 14.1.1 Command and control of the Emergency Operations Facility, including the Offsite Radiation Protection Facility and site access.
- 14.1.2 Overall management and responsibility for the emergency response and recovery operations for NextEra Energy Point Beach, with the non-delegable responsibilities for decisions regarding;
  - a. Approval of Protective Actions Recommendations for offsite agencies.
  - b. Ensuring notification of Federal, State and County authorities.
  - c. Request for federal assistance.
  - d. Authorizing the use of potassium iodide (KI).
  - e. Authorizing emergency radiation exposures in excess of 10 CFR 20 limits or in excess of maximum NextEra Energy Point Beach yearly administrative level.
- 14.1.3 Serve as senior company contact for offsite governmental agencies at the site (NRC, FEMA, Wisconsin Emergency Management, county authorities).
- 14.1.4 Provide or delegate the responsibility to provide the JPIC personnel with information for use by the news media during an emergency.

14.2 Principal Working Relationships

Assistant EOF Manager , Emergency Director, TSC Manager, Dose/PAR Coordinator, JPIC Manager, Plant Spokesperson

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

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19.2 Principal Working Relationships

EOF Manager, Assistant EOF Manager, Plant Spokesperson, Assistant JPIC Manager,  
Newswriter

20.0 MECHANICAL LEADER

20.1 Responsibilities

20.1.1 Prepare, brief, and dispatch reentry teams on job scope, safety, and hazardous conditions.

20.1.2 Analyze mechanical problems and develop plans for monitoring and controlling plant problems.

20.2 Principal Working Relationships

Reentry Team Coordinator, Reentry Teams

21.0 MECHANICAL SYSTEM ENGINEER

21.1 Responsibilities

21.1.1 Analyze problems with the operation of plant systems and equipment and develop plans or modifications to mitigate any concerns.

21.1.2 Provide engineering support including Severe Accident Management response.

21.2 Principal Working Relationships

Engineering Coordinator

22.0 OFFSITE ASSEMBLY AREA COORDINATOR

22.1 Responsibilities

22.1.1 Control and organize the release of personnel assembled in onsite and offsite assembly areas.

22.1.2 Assist with radiological monitoring of evacuees and vehicles, as appropriate.

22.1.3 Maintain accountability for all personnel located in the SBCC.

22.1.4 Assist with maintaining habitability, contamination control and ALARA practices.

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

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22.2 Principal Working Relationships

TSC Manager, Assistant EOF Manager, Offsite Radiation Protection Coordinator,  
Security Coordinator

23.0 OFFSITE RADIATION PROTECTION COORDINATOR

23.1 Responsibilities

23.1.1 Direct the activities of the OSRPF and Field Monitoring Teams (FMTs) in support of the EOF.

23.1.2 Dispatch and control of FMTs:

a. Obtaining direct radiation, particulate, gas, and iodine samples.

b. Obtaining field environmental samples of air, water, and vegetation;

23.1.3 Implement monitoring, decontamination, and safety plans for personnel/vehicles evacuated from the site.

23.1.4 Coordinate and monitor facility habitability.

23.2 Principal Working Relationships

Dose/PAR Coordinator, Field Team Leader, SBCC Survey Leader, Rad/Chem Coordinator, Offsite Assembly Area Coordinator

24.0 OPERATIONS COORDINATOR

24.1 Responsibilities

24.1.1 Assist the TSC Manager in setting priorities of TSC activities in support of the Control Room.

24.1.2 Monitor event classifications, radiological release status, and provide recommendations to the TSC Manager and Emergency Director.

24.1.3 Ensure critical safety functions are being monitored and trended.

24.1.4 Coordinate the use of SAMGs in the Control Room and TSC with the Engineering Coordinator.

24.1.5 Analyze problems associated with the operations of plant systems and equipment.

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

---

24.2 Principal Working Relationships

Shift Manager, Emergency Director, OSC Coordinator

25.0 OPERATIONS LEADER

25.1 Responsibilities

- 25.1.1 Prepare, brief, and dispatch reentry teams on job scope, safety, and hazardous conditions.
- 25.1.2 Analyze operations problems and develop plans for monitoring and controlling plant problems.
- 25.1.3 Provide directions to individuals assigned to maintain reentry team radio communications and dispatched reentry team status.
- 25.1.4 Assist with development of work scope packages and modifications.

25.2 Principal Working Relationships

Reentry Team Coordinator, Reentry Teams

26.0 OPERATIONS SUPPORT CENTER COORDINATOR

26.1 Responsibilities

- 26.1.1 Ensure the OSC priorities and reentry teams are in direct support of the Control Room and TSC.
- 26.1.2 Direct dispatch of reentry teams as required for search and rescue, fire fighting, emergency repairs and damage assessment.
- 26.1.3 Assess OSC effectiveness and support the Reentry Team Coordinator as necessary.

26.2 Principal Working Relationships

Operations Coordinator, TSC Manager, Reentry Team Coordinator, Rad/Chem Coordinator

27.0 PLANT STATUS MONITOR

27.1 Responsibilities

- 27.1.1 Serve as a resource for plant and local environment data for event monitoring at the TSC and EOF.

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

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29.1.7 Offsite dose assessments until the EOF is activated.

29.1.8 Assist with development of plant procedures to process and control liquid, gaseous, and solid wastes.

29.2 Principal Working Relationships

Rad/Chem Monitor, Chemistry Leader, Dose/PAR Coordinator, Emergency Director, Radiation Protection Leader

30.0 RAD/CHEM MONITOR

30.1 Responsibilities

30.1.1 Assist the Rad/Chem Coordinator in assessment of onsite radiological conditions and communicating plant and facility habitability.

30.1.2 Maintain Systems/RMS status board in the TSC and provide assistance with the plant maps in the OSC.

30.2 Principal Working Relationships

Rad/Chem Coordinator, Radiation Protection Leader

31.0 RADIATION PROTECTION LEADER

31.1 Responsibilities

31.1.1 Prepare, brief, and dispatch reentry teams on job scope, safety, hazardous conditions, and radiological concerns.

31.1.2 Implement appropriate radiation protection support of all onsite activities.

31.1.3 Analyze radiation protection problems and develop plans for monitoring and controlling plant problems.

31.1.4 Manage radiological controls for post-accident sampling of containment atmosphere and reactor coolant system.

31.1.5 Maintain habitability, contamination control and ALARA practices within the TSC/OSC.

31.1.6 Ensure plant maps in the OSC are maintained with current radiological data and hazardous environments in the plant.

31.2 Principal Working Relationships

Reentry Team Coordinator, Rad/Chem Coordinator, Reentry Teams



EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

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34.0 RESOURCE COORDINATOR

34.1 Responsibilities

34.1.1 Support the emergency with onsite and offsite procurement needs, including:

- a. Staffing levels for response and recovery.
- b. Emergency equipment for emergency or recovery support.
- c. Communications equipment.
- d. Emergency facility supplies and equipment.
- e. Vendor and Contract support.

34.1.2 Utilize Emergency Preparedness Letters of Agreements as needed.

34.1.3 Establish and maintain communications with various private and federal offsite agencies in the event of an emergency, as needed; (e.g., PSCW, INPO, A&E, NSSS).

34.2 Principal Working Relationships

Assistant EOF Manager, TSC Manager

35.0 SBCC SURVEY LEADER

35.1 Responsibilities

35.1.1 Ensure habitability of the SBCC by the issuance of dosimetry, monitoring compliance with contamination control practices, and performing radiological and smear surveys.

35.1.2 Monitoring and decontamination of vehicles and personnel entering and leaving the exclusion area.

35.2 Principal Working Relationships

Offsite Radiation Protection Coordinator, Offsite Assembly Area Coordinator

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

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36.0 SECURITY COORDINATOR

36.1 Responsibilities

- 36.1.1 Ensure the safety of plant, visitors, contractor, and security personnel.
- 36.1.2 Direct the onsite Security personnel in maintaining the plant security program in support of the emergency situations and recovery operations.
- 36.1.3 Direct the coordination of personnel accountability and release from the site, plus restricting access to secured areas.
- 36.1.4 Coordinate security escorts of reentry teams as appropriate.
- 36.1.5 Coordinate onsite and offsite access to the plant as appropriate.

36.2 Principal Working Relationships

TSC Manager, EOF Manager, Assistant EOF Manager, Offsite Assembly Area Coordinator

37.0 SRC COMMUNICATOR

37.1 Responsibilities

- 37.1.1 Ensuring the State of Wisconsin State Radiological Coordinator (SRC) has adequate information to assist them in implementing offsite emergency plans.
- 37.1.2 Immediately informing the SRC of changes in emergency classification, radiological release status, or changes in protective action recommendations.
- 37.1.3 Providing plant and radiological status updates to the SRC.

37.2 Principal Working Relationships

Dose/PAR Coordinator, State of Wisconsin SRC

38.0 STATE LIAISON

38.1 Responsibilities

- 38.1.1 Respond to State EOC personnel questions regarding forms transmitted, classifications, PARs, and nuclear terminology.
- 38.1.2 Work in parallel with the state and EOF to ensure that they are receiving accurate and timely utility information.

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

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38.2 Principal Working Relationships

State of Wisconsin EOC Director and SRC, State/County Communicator,  
SRC Communicator

39.0 STATE/COUNTY COMMUNICATOR

39.1 Responsibilities

39.1.1 Ensuring the state and counties have adequate information to assist them in implementing offsite emergency plans.

39.1.2 Immediately informing the state and counties of changes in emergency classification, radiological release status, or in protective action recommendations.

39.1.3 Providing plant and radiological status updates to the state and counties.

39.2 Principal Working Relationships

ERF Communicator-EOF, State and Counties EOC Directors, State and County Liaisons

40.0 EMERGENCY DIRECTOR

40.1 Responsibilities

40.1.1 Direct onsite emergency response in support of the Control Room by assuming the responsibility of:

a. Approval of classification/re-classification of emergencies.

b. Onsite protective actions

c. Onsite radiological assessment

d. NRC (ENS) Communications

e. Assembly, accountability, and evacuation of personnel

f. Authorizing the use of potassium iodide (KI)

g. Authorizing emergency radiation exposures in excess of 10 CFR 20 limits or in excess of maximum NextEra Energy Point Beach yearly administrative level.

40.2 Principal Working Relationships

EOF Manager, Assistant EOF Manager, TSC Manager, Shift Manager, Operations Coordinator, Engineering Coordinator

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

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41.0 TSC MANAGER

41.1 Responsibilities

- 41.1.1 Implement onsite operating procedures and EPIP's in support of the emergency response.
- 41.1.2 Evaluate changes in plant critical safety function areas, fission product barrier status, and classification changes.
- 41.1.3 Resolve questions concerning plant licensing requirements with the NRC.

41.2 Principal Working Relationships

Emergency Director, Assistant EOF Manager, EOF Manager

42.0 ERF COMMUNICATOR-EOF

42.1 Responsibilities

- 42.1.1 Maintaining a continuous communications flow between the EOF, TSC, Control Room, and JPIC to monitor:
  - a. Event classification, radiological release status, and Protective Action Recommendations
  - b. Plant and equipment status
  - c. Onsite radiological information
  - d. Procedures in use
  - e. Major activities and decisions within each facility
- 42.1.2 Monitor data points and trends which could result in an event classification change.

42.2 Principal Working Relationships

EOF Manager, Assistant EOF Manager, ERF Communicators-CR/TSC/JPIC

EMERGENCY RESPONSE ORGANIZATION PERSONNEL  
FUNCTION AND RESPONSIBILITY

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43.0 ERF COMMUNICATOR-CR

43.1 Responsibilities

43.1.1 Maintaining a continuous communications flow between the Control Room, TSC, EOF, and JPIC and to monitor:

- a. Event classification, radiological release status, and Protective Action Recommendations
- b. Plant and equipment status
- c. Onsite radiological information
- d. Procedures in use
- e. Major activities and decisions within each facility

43.1.2 Monitor data points and trends which could result in an event classification change.

43.2 Principal Working Relationships

Shift Manager, ERF Communicators-TSC/EOF/JPIC

44.0 PLANT SPOKESPERSON

44.1 Responsibilities

44.1.1 Attend media briefings to address public concerns.

44.1.2 Liaison and communication between the emergency response organization and other corporate departments affected by the emergency or whose services are required to support the response.

44.1.3 Approve news statements.

44.2 Principal Working Relationships

EOF Manager, Assistant EOF Manager, JPIC Manager

**ENCLOSURE 1, ATTACHMENT 3**

**NEXTERA ENERGY POINT BEACH, LLC  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2**

**LICENSE AMENDMENT REQUEST 277  
REVISION TO STAFF AUGMENTATION TIMES IN THE  
PBNP EMERGENCY PLAN**

**SUMMARY OF ERO POSITION CHANGES**

## ERO Position Summary

Current Performer / Functions	Proposed Performer / Functions
<p><b>Emergency Director (EOF)</b> Overall management and responsibility for the emergency response and recovery operations for NextEra Energy Point Beach with the following non-delegable responsibilities for decisions regarding:</p> <ul style="list-style-type: none"> <li>- Approval of classification/re-classification of emergencies</li> <li>- Approval of Protective Action Recommendations for offsite agencies</li> <li>- Ensuring notification of Federal, State and County authorities</li> <li>- Request for Federal Assistance</li> <li>- Authorization for the use of potassium iodide (KI)</li> <li>- Authorizing emergency radiation exposures in excess of 10 CFR 20 limits or in excess of maximum NextEra Energy Point Beach yearly administrative limits</li> </ul> <p>Serve as senior company contact for offsite governmental agencies Provide JPIC personnel with information for use by news media during an emergency</p>	<p><b>EOF Manager (EOF)</b> Overall management and responsibility for the emergency response and recovery operations for NextEra Energy Point Beach with the following non-delegable responsibilities for decisions regarding: (Approval of classification/re-classification task moved to ED position)</p> <ul style="list-style-type: none"> <li>- Approval of Protective Action Recommendations for offsite agencies</li> <li>- Ensuring notification of Federal, State and County authorities</li> <li>- Request for Federal Assistance</li> <li>- Authorization for the use of potassium iodide (KI)</li> <li>- Authorizing emergency radiation exposures in excess of 10 CFR 20 limits or in excess of maximum NextEra Energy Point Beach yearly administrative limits</li> </ul> <p>Serve as senior company contact for offsite governmental agencies Provide JPIC personnel with information for use by news media during an emergency</p>
<p><b>Emergency Director (EOF)</b></p> <ul style="list-style-type: none"> <li>- Approval of classification/re-classification of emergencies</li> <li>- Authorization for the use of potassium iodide (KI)</li> </ul>	<p><b>Emergency Director</b></p> <ul style="list-style-type: none"> <li>- Approval of Protective Action Recommendations for offsite agencies (until EOF is activated)</li> <li>- Ensuring notification of Federal, State and County authorities (until EOF is activated)</li> <li>- Request for Federal Assistance (until EOF is activated)</li> <li>- Approval of classification/re-classification of emergencies</li> <li>- Authorization for the use of potassium iodide (KI)</li> <li>- Authorizing emergency radiation exposures in excess of 10 CFR 20 limits or in excess of maximum NextEra Energy Point Beach yearly administrative limits</li> </ul>
<p><b>EOF Manager</b></p> <ul style="list-style-type: none"> <li>- Command and control of the Emergency Operations Facility including offsite radiation protection facility and site access</li> </ul>	<p><b>EOF Manager</b></p> <ul style="list-style-type: none"> <li>- Command and control of the Emergency Operations Facility including offsite radiation protection facility and site access</li> </ul>
<p><b>EOF Manager</b></p> <ul style="list-style-type: none"> <li>- Command and control of the Emergency Operations Facility including offsite radiation protection facility and site access</li> <li>- Ensure EOF has adequate staffing level to respond to the event</li> <li>- Maintain information flow with the control room and TSC to establish priorities and focus</li> <li>- Ensure initial and continuing communications are maintained with offsite agencies</li> <li>- Interface with responding representatives from offsite emergency agencies and assist in their information and communication needs</li> <li>- Maintain accountability of personnel at the EOF and assess and provide for any considerations necessary for their safety</li> </ul>	<p><b>Assistant EOF Manager</b> (Command and control task remains with EOF Manager)</p> <ul style="list-style-type: none"> <li>- Ensure EOF has adequate staffing level to respond to the event</li> <li>- Maintain information flow with the control room and TSC to establish priorities and focus</li> <li>- Ensure initial and continuing communications are maintained with offsite agencies</li> <li>- Interface with responding representatives from offsite emergency agencies and assist in their information and communication needs</li> <li>- Maintain accountability of personnel at the EOF and assess and provide for any considerations necessary for their safety</li> </ul>

Current Performer / Functions	Proposed Performer / Functions
<b>EAL Monitor (EOF)</b> <ul style="list-style-type: none"> <li>- Monitor plant parameters for potential changes in Emergency Action Level and Protective Actions Recommendations</li> <li>- Monitor and recommend changes to classification, radiological release status and Protective Action Recommendations</li> <li>- Maintain the fission product barrier status board</li> <li>- Fill out the Nuclear Accident Reporting System (NARS) form</li> </ul>	<b>EAL Monitor (TSC)</b> <ul style="list-style-type: none"> <li>- Monitor plant parameters for potential changes in Emergency Action Level and Protective Actions Recommendations</li> <li>- Monitor and recommend changes to classification, radiological release status and Protective Action Recommendations</li> <li>- Maintain the fission product barrier status board (Fill out Form task moved to Assistant EOF Manager)</li> </ul>
<b>EAL Monitor (EOF)</b> <ul style="list-style-type: none"> <li>- Fill out the Nuclear Accident Reporting System (NARS) form</li> </ul>	<b>Assistant EOF Manager</b> <ul style="list-style-type: none"> <li>- Fill out the Nuclear Accident Reporting System (NARS) form</li> </ul>
<b>TSC Manager</b> Direct onsite emergency response in support of the Control Room by assuming the responsibility of; <ul style="list-style-type: none"> <li>- Onsite protective actions</li> <li>- Onsite radiological assessment</li> <li>- NRC (ENS) Communications</li> <li>- Assembly, accountability and evacuation of personnel</li> </ul> Implement onsite operating procedures and EIPs in support of emergency response Evaluate changes in plant critical safety function areas, fission product barrier status and classification changes Resolve questions concerning plant licensing requirements with the NRC	<b>Emergency Director</b> Direct onsite emergency response in support of the Control Room by assuming the responsibility of; <ul style="list-style-type: none"> <li>- Onsite protective actions</li> <li>- Onsite radiological assessment</li> <li>- NRC (ENS) Communications</li> <li>- Assembly, accountability and evacuation of personnel</li> </ul> (Remaining tasks continue to be assigned to the TSC Manager as noted below)
<b>TSC Manager</b> Implement onsite operating procedures and EIPs in support of emergency response Evaluate changes in plant critical safety function areas, fission product barrier status and classification changes Resolve questions concerning plant licensing requirements with the NRC	<b>TSC Manager</b> Implement onsite operating procedures and EIPs in support of emergency response Evaluate changes in plant critical safety function areas, fission product barrier status and classification changes Resolve questions concerning plant licensing requirements with the NRC



**ENCLOSURE 2**

**NEXTERA ENERGY POINT BEACH, LLC  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2**

**LICENSE AMENDMENT REQUEST 277  
REVISION TO STAFF AUGMENTATION TIMES IN THE  
PBNP EMERGENCY PLAN**

**COMPARISON BETWEEN NUREG-0654 REVISION 1,  
THE 1983 NRC APPROVED EMERGENCY PLAN REVISION 20,  
THE CUIRRENT EMERGENCY PLAN,  
AND THE PROPOSED CHANGES TO THE EMERGENCY PLAN**

3 Pages follow

**Site On-Shift Table Comparison**

Major Functional Area	Major Tasks	Position Title / Expertise	0654 Table B-1 on-shift*	PBNP Rev 20 1983	PBNP Current Revision	PBNP Proposed
Plant Operation and Assessment of Operation Aspects		Shift Supervisor (SRO)	1	1	1	1
		Shift Foreman (SRO)	1	1	2	2
		Control Room Operators	2	2	4	4
		Auxiliary Operators	2	4	5	5
Emergency Direction and Control (Emergency Coordinator) ***		STA. Shift Supervisor or facility manager	1**	1**	1**	1**
Notification / Communication ****	Notify State/local and federal personnel, maintain communication		1****	1	1	1
Radiological Accident Assessment and Support of Operational Accident Assessment	In-Plant surveys	HP Technicians	1		1	1
	Chemistry / Radiochemistry	Chem/HP Technicians	1	.5	1	1
Plant System Engineering	Technical support	Shift Technical Advisor	1	1	1	1
Repair and Corrective Actions	Repair and Corrective Actions	Mechanical Maintenance	1**	1**	1**	1**
		Electrical Maintenance	1**	1**	1**	1**
Protective Actions (In-Plant)	Radiation Protection: a. Access Control b. HP Coverage for repair, corrective actions, search and rescue first-aid & firefighting c. Personnel monitoring d. Dosimetry	HP Technicians	2**	2**	2**	2**
Firefighting		Fire Brigade per Tec Specs			2	2
Rescue Operations and First- Aid			2**	2**	2**	2**
Site Access Control and Personnel Accountability	Security, firefighting communications, personnel accountability	Security personnel per security plan				
<b>Total On-Shift</b>			<b>10</b>	<b>10.5</b>	<b>18</b>	<b>18</b>

\*For each unaffected unit, maintain at least 1 SF, 1 CRO, 1 AO

\*\*May be provided by shift personnel assigned other functions

\*\*\*Overall direction to be assumed by EOF Director when ERF's are fully manned

\*\*\*\*May be performed by engineering aid to shift supervisor

**Site 30 Minute Augmented ERO Table Comparison**

Major Functional Area	Major Tasks	Position Title / Expertise	Table B-1 Augment	PBNP Rev 20 1983	PBNP Current Revision (30 min)	PBNP Proposed (60 min)
Notification / Communication	Notify State/local and federal personnel, maintain communication		1			2
Radiological Accident Assessment and Support of Operational Accident Assessment	EOF Director	Senior Manager			1	5
	Offsite Dose Assessment	Sr. HP Expertise	1		2	1
	Offsite Surveys	HP Technicians	2			3
	On-Site Surveys	HP Technicians	1			1
	In-Plant surveys	HP Technicians	1			
	Chemistry / Radiochemistry	Chem/HP Technicians			1	1
Plant System Engineering	Technical Support	Core/Thermal Hydraulics	1			1
		Electrical				
		Mechanical				
Repair and Corrective Actions	Repair and Corrective Actions	Mechanical Maintenance				1
		Rad Waste Operator				
		Electrical Maintenance	1		1	1
		I&C Technician	1		1	1
Protective Actions (In-Plant)	Radiation Protection: a. Access Control b. HP Coverage for repair, corrective actions, search and rescue first-aid & firefighting c. Personnel monitoring d. Dosimetry	HP Technicians	2			1
<b>Total Augmented ERO</b>			<b>11</b>	<b>NA*</b>	<b>6</b>	<b>18</b>

\*The PBNP Emergency Plan Revision 20 commitment stated, "If appropriate, the TSC will be activated in approximately 30 minutes and be fully operational within one hour." The Plan did not specifically identify 30 minute and 60 minute responders.

**Site 60 Minute Augmented ERO Table Comparison**

Major Functional Area	Major Tasks	Position Title / Expertise	Table B-1 Augment	PBNP Rev 20 1983	PBNP Current Revision (60 min)	PBNP Proposed (90 min)
Notification / Communication	Notify State/local and federal personnel, maintain communication		2		4	2
Radiological Accident Assessment and Support of Operational Accident Assessment	EOF Director	Senior Manager	1		4	2
	Offsite Dose Assessment	Sr. HP Expertise				1
	Offsite Surveys	HP Technicians	2		3	
	On-Site Surveys	HP Technicians	1		1	
	In-Plant surveys	HP Technicians	1			
	Chemistry / Radiochemistry	Chem/HP Technicians	1			
Plant System Engineering	Technical Support	Core/Thermal Hydraulics			1	
		Electrical	1			
		Mechanical	1			
Repair and Corrective Actions	Repair and Corrective Actions	Mechanical Maintenance	1		1	
		Rad Waste Operator	1			
		Electrical Maintenance	1			
		I&C Technician				
Protective Actions (In-Plant)	Radiation Protection: a. Access Control b. HP Coverage for repair, corrective actions, search and rescue first-aid & firefighting c. Personnel monitoring d. Dosimetry	HP Technicians	2		1	
		Additional personnel (Site specific)			1	1
<b>Total Augmented ERO</b>			<b>15</b>	<b>NA*</b>	<b>16</b>	<b>6</b>

\* The PBNP Emergency Plan Revision 20 commitment stated, "If appropriate, the TSC will be activated in approximately 30 minutes and be fully operational within one hour." The Plan did not specifically identify 30 minute and 60 minute responders.