

## PMLevyCOLPEM Resource

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**From:** Galletta, Thomas  
**Sent:** Tuesday, June 23, 2015 9:40 AM  
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**Cc:** Habib, Donald  
**Subject:** Revised License Conditions for Levy

Bob,  
The staff is planning to revise license condition language from that stated in the Levy COL Advanced SE for Chapter 20 (ML12108A197) and Chapter 13 (ML12013A076).

Below are the staff's latest revisions to license conditions for Mitigation Strategies (following Fermi License) and the EP ITAAC - LCs (following Crystal River Exemption).

**Mitigation Strategies - LC (ASE page 20-29) (ML12108A197)**

License Condition (20-1) (Revised) – Mitigation Strategies for Beyond Design-Basis External Events:

- a. The Licensee shall complete development of an overall integrated plan of strategies to mitigate a beyond-design-basis external event at least 1 year before the completion of the last ITAAC on the schedule required by 10 CFR 52.99(a).
- b. The overall integrated plan required by this condition must include guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities. The overall integrated plan must include provisions to ensure that all accident mitigation procedures and guidelines (including the guidance and strategies required by this section, emergency operating procedures, abnormal operating procedures, and extensive damage management guidelines).
- c. The guidance and strategies required by this condition must be capable of (i) mitigating a simultaneous loss of all alternating current (ac) power and loss of normal access to the normal heat sink and (ii) providing for adequate capacity to perform the functions upon which the guidance and strategies rely for all units on the Levy site and in all modes at each unit on the site.
- d. Before initial fuel load, the Licensee shall fully implement the guidance and strategies required by this condition, including:
  1. Procedures;
  2. Training;
  3. Acquisition, staging, or installation of equipment and consumables relied upon in the strategies; and
  4. Configuration controls and provisions for maintenance and testing (including testing procedures and frequencies for preventative maintenance) of the equipment upon which the strategies and guidance required by this condition rely.
- e. The training required by condition d.2 must use a Systematic Approach to Training (SAT) to evaluate training for station personnel, and must be based upon plant equipment and procedures upon which the guidance and strategies required by this condition rely.
- f. The Licensee shall maintain the guidance and strategies described in the application upon issuance of the license, and the integrated plan of strategies upon its completion as required by condition a. the Licensee may change the strategies and guidelines required by this Condition provided that the Licensee evaluates each such change to ensure that the provisions of conditions b and c continue to be satisfied and the Licensee documents the evaluation in an auditable form.

**EP ITAAC - LCs (following Crystal River Exemption) (ASE page 13-23 & 13-24) (ML12013A076)**

The licensee shall perform and satisfy the ITAAC defined in SER Table 13.3-1, "Emergency Plan ITAAC."

- License Condition (13-3) (Revised) – The licensee shall develop a schedule that supports planning for and conduct of NRC inspections of the operational programs listed in LNP COL FSAR Table 13.4-201, "Operational Programs Required by NRC Regulations." This schedule must be available to the NRC staff no later than 12 months after issuance of the COL. The schedule shall be updated every 6 months

until 12 months before scheduled fuel load, and every month thereafter until the operational programs listed in LNP COL FSAR Table 13.4-201 have been fully implemented. This schedule shall include a schedule for submitting the EP implementing procedures to the NRC consistent with 10 CFR Part 50, Appendix E, Section V.

- License Condition (13-4) (No change) - DEF shall submit a fully developed set of site-specific EALs for LNP Units 1 [Unit 2] to the NRC in accordance with NEI 07-01, Revision 0, with no deviations. These EALs shall have been discussed and agreed upon with State and local officials. These fully developed EALs shall be submitted to the NRC for confirmation at least 180 days prior to initial fuel load.
- License Condition (13-5) (Capitalized word) - Prior to the full-participation exercise to be conducted in accordance with the requirements of Appendix E to 10 CFR Part 50, DEF shall have available for NRC inspection the LOAs established with the following entities:
  - a. State of Florida Division of Emergency Management
  - b. Citrus County, Florida Emergency Management Agency
  - c. Levy County, Florida Emergency Management Agency
  - d. Marion County, Florida Emergency Management Agency
  - e. Citrus Memorial Hospital
  - f. Seven Rivers Regional Medical Center
  - g. Citrus County, Department of Public Safety Fire Rescue Division
  - h. Nature Coast Emergency Medical Services Fire Department

These Letters of Agreement shall specify the emergency measures to be provided in support of the LNP emergency organization to include response to a hostile action event at the site; the mutually acceptable criteria and availability of adequate resources for their implementation; and arrangements for the exchange of information.

- License Condition (13-6) (Deleted)
- License Condition (13-7) (Revised) - DEF shall distribute the initial LNP public information publications, consistent with the LNP Emergency Plan, within 180 days prior to fuel load at LNP.
- License Condition (13-8) (Revised) - DEF shall conduct a detailed analysis of on-shift staffing, in accordance with the NRC endorsed version of NEI 10-05, "Assessment of On-Shift Emergency Response Organization Staffing and Capabilities," Revision 0, and the licensee shall incorporate any changes to the Emergency Plan needed to bring staffing to the required levels, prior to or concurrent with completion of EP ITAAC 2.0.

If you have questions, the staff can discuss them with you at a future, previously scheduled teleconference. Please contact Don Habib (301-415-1035) or me if you wish to discuss.

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