

**INTERIM FINDING REPORT for
REASONABLE ASSURANCE**

**On the Adequacy of the Offsite
Radiological Emergency Response Planning and Preparedness
For the
Levy Nuclear Power Station
Levy County, Florida**

December 17, 2009

Prepared by the
U.S. Department of Homeland Security
Federal Emergency Management Agency
Technological Hazards Division

Region IV

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EXECUTIVE SUMMARY

On August 7, 2008, Progress Energy submitted a Combined License (COL) Application to the U.S. Nuclear Regulatory Commission (NRC) to construct and operate the proposed Levy Nuclear Plant Unit 1 and 2 (LNP) facility located in Levy County, Florida in a primarily rural area located southwest of Gainesville, west of Ocala, and approximately 7 miles northeast of the Crystal River Energy Complex, an energy facility also owned by Progress Energy. The review of the materials provided with the COL Application resulted in findings for all sixteen Planning Standards. Fifteen of the sixteen Planning Standards were found to be Adequate. One Planning Standard was found to be Non Applicable.

The following materials provided with the COL Application were the basis for the review:

- The State of Florida Comprehensive Emergency Response Plan (SCEMP) dated February 2004.
- The State of Florida Radiological Emergency Management Plan, Annex A– Draft Appendix VI, dated April 2008.
- Levy Nuclear Plant Site Plan – Draft Appendix VI (August 2009)
- The State of Florida Radiological Emergency Response Plan (April 2008);
- Citrus County Radiological Emergency Response Plan (REP Plan), (October 2009);
- Draft Levy County Radiological Emergency Response Plan (REP Plan), June 2009; and
- Draft Marion County Radiological Emergency Response Plan (REP Plan), June 2009.

NUREG-0654 FEMA-REP-1, Rev. 1, “Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants,” amended March 2002, its Supplements, the Interim REP Program Manual (August 2002), and current FEMA guidance documents were considered in making the determination as to the plans’ adequacy.

The review of the offsite emergency plans resulted in evaluation findings for all of the planning standards and associated criteria contained in NUREG-0654 FEMA-REP-1, Rev. 1, as amended, that are ORO responsibilities. Each planning standard and criterion was rated as:

- Adequate: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed.
- Adequate – corrections must be made: Plans are adequate but before a determination can be made as to whether they can be implemented, corrections must be made to the plans or supporting measures must be demonstrated (e.g. adequacy and maintenance of procedure, training, resource, staffing levels and qualifications, and equipment).
- Inadequate: Plans are inadequate and cannot be implemented until they are revised to corrected deficiencies noted in the Federal review.
- N/A: The planning standard is not applicable to offsite response organizations.

Select criteria are not able to be evaluated in the planning phase. They are placed on the Post COL Reasonable Assurance Tracking Section of the report to be reviewed and evaluated prior to the Interim Finding Report for Reasonable Assurance on the Adequacy of Offsite Radiological Emergency Response Preparedness.

The initial review resulted in the following interim evaluation findings (ratings for each individual criterion are summarized in Section IV, Criterion Rating Summary):

- Planning Standard A: Adequate
- Planning Standard B: N/A
- Planning Standard C: Adequate
- Planning Standard D: Adequate
- Planning Standard E: Adequate, See Post COL Reasonable Assurance Tracking Form
- Planning Standard F: Adequate
- Planning Standard G: Adequate, See Post COL Reasonable Assurance Tracking Form
- Planning Standard H: Adequate
- Planning Standard I: Adequate
- Planning Standard J: Adequate
- Planning Standard K: Adequate
- Planning Standard L: Adequate
- Planning Standard M: Adequate
- Planning Standard N: Adequate
- Planning Standard O: Adequate
- Planning Standard P: Adequate

Adequacy of the LNP COL Application Emergency Plan review for OROs is also dependent on:

- Satisfactory resolution of Post COL Reasonable Assurance Tracking Form items listed in Section III of this report.
- Satisfactory demonstration of plan implementation during a joint exercise with the licensee and state and local governments and utilizing LNP Units 1 and 2 facilities.

I. Introduction

A. General Characteristics of the Levy Nuclear Site

The Levy Nuclear Plant Units 1 and 2 (LNP) Site is located in Levy County, Florida. The site is located in a primarily rural area located southwest of Gainesville, west of Ocala, and approximately 7 miles northeast of the Crystal River Energy Complex, an energy facility also owned by Progress Energy.

LNP consists of two (2) pressurized water reactors (PWRs), Units 1 and 2. These units are based on the Westinghouse Electric Company, LLC (Westinghouse) AP1000 (AP1000) standard design. The major structures of Units 1 and 2 that contain radioactive materials are the Containment Buildings, Annex Buildings, Radwaste Buildings, and the Auxiliary Buildings.

The Plume Exposure Pathway Emergency Planning Zone (EPZ) is defined as the area within an approximate 10-mile radius of the Levy Nuclear Plant (LNP) and is referred to as the 10-mile EPZ. The proposed EPZ includes portions of three Florida counties: Citrus, Levy, and Marion. Citrus and Levy Counties are also risk counties for the Crystal River Nuclear Power Plant.

The Ingestion Exposure Pathway EPZ is defined as the area within an approximate 50-mile radius of the LNP and is referred to as the 50-mile EPZ. The region within a 50-mile radius of LNP contains both urban and rural areas. The 50-mile Ingestion Exposure EPZ counties include Alachua, Citrus, Dixie, Gilchrist, Hernando, Lake, Levy, Marion, Pasco, Putnam, and Sumter.

Progress Energy is the applicant for the combined license application for the proposed LNP.

B. Emergency Response Organizations

The State of Florida has primary responsibility for the local population and environs, including the possible need for evacuation. The Division of Emergency Management (DEM) provides guidance and assistance in preparation of local emergency response procedures. The DEM provides personnel and equipment to emergency response facilities, and provides needed supplies to state and local political subdivisions.

The Director of the DEM is responsible for coordinating DEM emergency response. The DEM receives notification of an emergency at LNP via the State Warning Point-Tallahassee (SWPT); verifies the information contained in the notification messages; and alerts key state, local, and federal emergency response personnel, as appropriate.

The DEM coordinates initial off-site monitoring and assessment with Progress Energy until arrival of the DHBRC. The DEM also will initiate, if required, protective action responses, which could include evacuation of radiologically affected areas. The DEM is also responsible for providing a public information program for timely information regarding an

emergency and for assisting local governments in providing warnings and instructions to the general public.

The State of Florida has primary responsibility for the local population and environs, including the possible need for evacuation. The principal state and county agencies having emergency responsibilities are described in the State Plan. The State Warning Point-Tallahassee (SWPT) is the primary notification point for activation of the State Plan.

C. Plans

The State of Florida Radiological Emergency Response Plan (April 2008) provides for the guidance, coordination and utilization of state and other resources in support of affected county government(s) off-site operations during an emergency resulting from a radiological incident at Nuclear Power Facilities in the State or contiguous states. It is written in accordance with the planning standards contained in NUREG-0654, FEMA REP-1, Rev. 1, dated November 1980. The State's Radiological Emergency Response Plan complements and is designed to interface with the Florida Emergency Operations Plan.

The State of Florida has developed radiological emergency response plans for other commercial nuclear facilities' within the State. Citrus, Levy and Marion Counties have developed radiological emergency response plans for the Crystal River Nuclear Power Plant located in Levy County. Both the State and counties have a current framework to modify and incorporate the LNP. In early 2008 the State of Florida, Citrus, Levy and Marion Counties agreed to "participate in the continuing planning efforts and scheduled field demonstrations." No further action is required of the State and county governments until a license is granted and a construction decision is made by Progress Energy.

D. Basis of Findings

The following documents were received from the Nuclear Regulatory Commission for FEMA's review:

1. State of Florida references:

- The State of Florida Comprehensive Emergency Response Plan (SCEMP) dated February 2004.
- The State of Florida Radiological Emergency Management Plan, Annex A– Draft Appendix VI, dated April 2008.
- Levy Nuclear Plant Site Plan – Draft Appendix VI (August 2009)
- The State of Florida Radiological Emergency Response Plan (April 2008);
- Citrus County Comprehensive Emergency Management Plan (2007)
- Citrus County Radiological Emergency Response Plan (REP Plan), (October 2009);
- Citrus County Emergency Operations Plan (2010)
- Letter from Citrus County Sheriff's Department received on April 30, 2009;
- Levy County Comprehensive Emergency Management Plan (December 2006)
- Draft Levy County Radiological Emergency Response Plan (REP Plan), (June 2009);
- Letter from Levy County Department of Emergency Management received on April

- 30, 2009;
- Draft Marion County Radiological Emergency Response Plan (REP Plan), (June 2009);
- Letter from Marion County Department of Emergency Management received on April 30, 2009.

E. Evaluation Format

Interim Findings in this report are based on the following guidance:

- 44 CFR 353, Appendix A
- Published FEMA REP Regulations and Guidance Documents
- NUREG 0654/FEMA REP-1, Rev.1

II. Review and Evaluation of Emergency Preparedness Plans and Procedures for the LeVY Nuclear Site Against the Planning Standards of NUREG-0654/FEMA-REP-1, Rev. 1

A. Assignment of Responsibility (Organization Control):

Primary responsibilities for emergency response by the nuclear facility licensee, and by State and local organizations within the Emergency Planning Zone 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.

- A.1.a.** Evaluation Criterion: Each plan shall identify the State, local, Federal and private sector organizations (including utilities), that are intended to be part of the overall response organization for Emergency Planning Zones. (See appendix 5).

Criterion Statement

State of Florida: Plans are adequate. The State of Florida plans identify and describe Federal, State, local and private-sector organizations that would comprise the overall offsite response to an incident at nuclear power plant site within the state. State response agencies are categorized by Emergency Support Functions (ESF) and include a detailed listing of each function.

Citrus County: Plans are adequate. Citrus County has developed site specific radiological emergency response plans for the Levy Nuclear Plant (LNP) which lists the Federal, state, county and other support organizations that will provide assistance during an emergency.

Levy County: Plans are adequate. Levy County has developed site specific radiological emergency response plans for LNP which lists the Federal, state, county and other support organizations that will provide assistance during an emergency.

Marion County: Plans are adequate. Marion County has developed site specific radiological emergency response plans for the LNP, which identify the Federal, State and local response organizations that will respond to an incident at LNP.

Plan Reference

State of Florida Plan references:

- Chapter 2 sections II-VII
- REMP, App. VI section II.A., B., & C

Citrus County Plan references:

- Letter from Citrus County Sheriff's Department received on April 30, 2009
- CEMP
- Radiological Emergency Preparedness Plan

- “Organization and Responsibilities”
- Section III, Part 1 to sub-Part 1.13,
- "Citrus County Primary / Support Responsibilities”
- Section V, Figure 4A
- “Emergency Support Functions (ESF)”
- Section V, Figure 4B

Levy County Plan references:

- Letter from Levy County Department of Emergency Management received on April 30, 2009
- CEMP
“Assignment of Responsibilities”
-I-B, Basic Page 33 and ESF Annexes
- Radiological Emergency Preparedness Plan

Marion County Plan references:

- CEMP
- Radiological Emergency Preparedness Plan

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

A.1.b. Evaluation Criterion: Each organization and sub organization having an operational role shall specify its concept of operations and its relationship to the total effort.

Criterion Statement

State of Florida: Plans are adequate. The role of state government in response to a nuclear power plant emergency is to support local government operations. State actions are coordinated through the State Emergency Operations Center as outlined in Section IV, Method of Operations, of the State of Florida Comprehensive Emergency Management Plan. An Executive Order will be drafted by the Division of Emergency Management upon licensee notification of an Alert emergency classification and may be signed by the Governor. An executive order will be signed by the Governor upon utility notification of a Site Area Emergency classification or higher. A signed Executive Order declares a state of emergency designates a State Coordinating Officer and allows for enhanced state assistance from the State Emergency Operations Center.

Citrus County: Plans are adequate. Citrus County has developed site specific radiological emergency response plans for LNP that outline the county agency and organizational roles and responsibilities in an emergency response.

Levy County: Plans are adequate. Levy County has developed site specific radiological emergency response plans for LNP that outline the county agency and organizational roles and responsibilities in an emergency response.

Marion County: Plans are adequate. Marion County has developed site specific radiological emergency response plans for LNP that outline the county agency and organizational roles and responsibilities in an emergency response.

Plan Reference

State of Florida Plan references:

- Chapter 2 sections II-VII
- Chapter 3 section II
- REMP, App. VI section II.A., B., & C

Citrus County Plan references:

- Radiological Emergency Preparedness Plan
- Letter from Citrus County Sheriff's Department received on April 30, 2009
- CEMP

Levy County Plan references:

- Radiological Emergency Preparedness Plan
- Letter from Levy County Department of Emergency Management received on April 30, 2009
- CEMP

Marion County Plan references:

- Radiological Emergency Preparedness Plan
- Letter from Marion County Department of Emergency Management received on April 30, 2009
- CEMP

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- A.1.c.** Evaluation Criterion: Each plan shall illustrate these interrelationships in a block diagram.

Criterion Statement

State of Florida: Plans are adequate. State of Florida plans contain illustrations of interrelationships in the form of block diagrams throughout their plans.

Citrus County: Plans are adequate. Citrus County has created the organizational diagram for LNP. The State of Florida REMP Appendix VI includes a block diagram/organizational chart that show the general relationships within Citrus County.

Levy County: Plans are adequate. Levy County has created the organizational diagram for LNP. The State of Florida REMP Appendix VI includes a block diagram/organizational chart that show the general relationships within Levy County.

Marion County: Plans are adequate. Marion County has developed the organizational diagram for LNP. The State of Florida REMP Appendix VI includes a block diagram/organizational chart that show the general relationships within Marion County.

Plan Reference

State of Florida references:

- Chapter 2 figures 2-1 and 2-2
- REMP, App. VI Figure VI-4, 6 and 8.

Citrus County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Levy County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Marion County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- A.1.d.** Evaluation Criterion: Each organization shall identify a specific individual by title that shall be in charge of the emergency response.

Criterion Statement

State of Florida: Plans are adequate. The organizational structure that the State of Florida will use in response to a commercial nuclear power plant emergency is described in Section IV, Method of Operations, of the State Comprehensive Emergency Management Plan. The State Emergency Response Team will operate from the State Emergency Operations Center in Tallahassee and will be led by a Governor-appointed State Coordinating Officer, usually the Director of the Division of Emergency Management.

Citrus County: Plans are adequate. The Citrus County REP Plan specifies an individual by title that will be in charge of the emergency response which includes response to an incident at LNP.

Levy County: Plans are adequate. The Levy County REP Plan specifies an individual by title that will be in charge of the emergency response to include responses to an incident at LNP.

Marion County: Plans are adequate. The Marion County REP Plan specifies an individual by title that will be in charge of the emergency response. The plan also provides for delegation of authority for the emergency response.

Plan Reference

State of Florida Plan references:

- Chapter 2 section I
- REMP, App. VI section II. A., B., C.
- REMP, App. VI section III. A., B., C.

Citrus County Plan references:

- Radiological Emergency Preparedness Plan

Levy County Plan references:

- Radiological Emergency Preparedness Plan

Marion County Plan references:

- Radiological Emergency Preparedness Plan

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- A.1.e.** Evaluation Criterion: Each organization shall provide for 24-hour per day emergency response, including 24-hour per day manning of communications links.

Criterion Statement

State of Florida: Plans are adequate. Staffing at the State Emergency Operations Center for 24-hour operations for an extended length of time will be according to established operating guidelines. The emergency support functions are responsible for assuring continuity of their respective agencies' resources to ensure 24-hour emergency operations for an extended period of time.

Citrus County: Plans are adequate. The Citrus County REP Plan describes 24-hour response procedures, staffing, location of the communication center and warning point and management of the communications center.

Levy County: Plans are adequate. The Levy County REP Plan describes 24-hour response procedures, staffing, location of the communication center and warning point and management of the communications center.

Marion County: Plans are adequate. The Marion County REP Plan describes 24-hour response procedures, staffing, and location of the communication center and management of the communications center.

Plan Reference

State of Florida Plan references:

- Chapter 2, section I
- REMP, App. VI section II. A., B., C.

Citrus County Plan references:

- Radiological Emergency Preparedness Plan

Levy County Plan references:

- Radiological Emergency Preparedness Plan

Marion County Plan references:

- Radiological Emergency Preparedness Plan

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- A.2.a.** Evaluation Criterion: Each organization shall specify the functions and responsibilities for major elements and key individuals by title, of emergency response, including the following: Command and Control, Alerting and Notification, Communications, Public Information, Accident Assessment, Public Health and Sanitation, Social Services, Fire and Rescue, Traffic Control, Emergency Medical Services, Law Enforcement, Transportation, Protective Response (including authority to request Federal assistance and to initiate other protective actions), and Radiological Exposure Control. The description of these functions shall include a clear and concise summary such as a table of primary and support responsibilities using the agency as one axis, and the function as the other. (See Section B for licensee).

Criterion Statement

State of Florida: Plans are adequate. The State of Florida plans identify and describe Federal, State, local and private-sector organizations that would comprise the overall

offsite response to an incident at nuclear power plant site within the state. State response agencies are categorized by Emergency Support Functions (ESF) and include a detailed listing and table of each function/task.

Citrus County: Plans are adequate. The Citrus County REP Plan describes the specific functions and responsibilities by title of the local agencies involved.

Levy County: Plans are adequate. The Levy County REP Plan describes the specific functions and responsibilities by title of the local agencies involved.

Marion County: Plans are adequate. The Marion County REP Plan describes the specific functions and responsibilities by title of the local agencies involved.

Plan Reference

State of Florida Plan references:

- Chapter 2 sections I and II and figure 2-2
- REMP, App. VI section II. A., B., C.

Citrus County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Levy County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Marion County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

A.2.b. Evaluation Criterion: Each plan shall contain (by reference to specific acts, codes or statutes) the legal basis for such authorities.

Criterion Statement

State of Florida: Plans are adequate. The Division of Emergency Management and all county jurisdictions of the State of Florida are authorized in Sections 252.35, 252.37, and 252.60 of the Florida Statutes to participate in cooperative relationships to accept services, equipment, supplies, materials, or funds for emergency management efforts. The Division of Emergency Management may assign the right to accept such services,

equipment, supplies, materials, or funds to any appropriate local governing body or agency.

Citrus County: Plans are adequate. The Citrus County REP Plan provides references to the legal basis for authorities.

Levy County: Plans are adequate. The Levy County REP Plan provides references to the legal basis for authorities.

Marion County: Plans are adequate. The Marion County REP Plan provides references to the legal basis for authorities.

Plan Reference

State of Florida Plan references:

- Chapter 2 section I
- REMP, App. VI section II. A., B., C.

Citrus County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Levy County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Marion County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- A.3.** Evaluation Criterion: Each plan shall include written agreements referring to the concept of operations developed between Federal, State, and local agencies and other support organizations having an emergency response role within the Emergency Planning Zones. The agreements shall identify the emergency measures to be provided and the mutually acceptable criteria for their implementation, and specify the arrangements for exchange of information. These agreements may be provided in an appendix to the plan or the plan itself may contain descriptions of these matters and a signature page in the plan may serve to verify the agreements. The signature page format is appropriate for organizations where response functions are covered by laws, regulations or executive orders where separate written agreements are not necessary.

Criterion Statement

State of Florida: Plans are adequate. The Division of Emergency Management and all county jurisdictions of the State of Florida are authorized in Sections 252.35, 252.37, and 252.60 of the Florida Statutes to participate in cooperative relationships to accept services, equipment, supplies, materials, or funds for emergency management efforts. The Division of Emergency Management may assign the right to accept such services, equipment, supplies, materials, or funds to any appropriate local governing body or agency.

Citrus County: Plans are adequate. Citrus County has developed letters of agreement to support operations.

Levy County: Plans are adequate. Levy County has developed letters of agreement to support operations.

Marion County: Plans are Adequate. Marion County has developed letters of agreement to support a response to an incident at LNP.

Plan Reference

State of Florida Plan references:

- Chapter 2 section I
- REMP, App. VI section II.

Citrus County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Levy County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Marion County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- A.4.** Evaluation Criterion: Each principal organization shall be capable of continuous (24-hour) operations for a protracted period. The individual in the principal organization who will be responsible for assuring continuity of resources (technical, administrative, and material) shall be specified by title.

Criterion Statement

State of Florida: Plans are adequate. Staffing at the State Emergency Operations Center for 24-hour operations for an extended length of time will be according to established operating guidelines. The emergency support functions are responsible for assuring continuity of their respective agencies' resources to ensure 24-hour emergency operations for an extended period of time.

Citrus County: Plans are adequate. The Citrus County REP Plan addresses 24-hour operations and personnel rosters for alert and notification.

Levy County: Plans are adequate. The Levy County CEMP addresses 24-hour operations and personnel rosters for alert and notification.

Marion County: Plans are adequate. The Marion County CEMP addresses 24-hour operations and personnel rosters for alert and notification.

Plan Reference

State of Florida Plan references:

- Chapter 2 section I
- REMP, App. VI section II. A., B., C.

Citrus County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Levy County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Marion County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

C. Emergency Response Support and Resources Planning Standard: Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the Licensee's near-site Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.

C.1 The Federal government maintains in-depth capability to assist licensees, States and local governments through the Federal Radiological Emergency Response Plan (FREPP Plan),

May 8, 1996 (61 FR 20944)*. Each State and licensee shall make provisions for incorporating the Federal response capability into its operation plan, including the following:

*The FREP Plan was superseded by the National Response Framework, Nuclear/Radiological Incident Annex (73 FR 4887).

- C.1.a.** Evaluation Criterion: specific persons by title authorized to request Federal assistance; see A.1.d., and A.2.a.

Criterion Statement

State of Florida: Plans are adequate. When it is determined that an accident at a nuclear power plant cannot be adequately controlled with resources available to state radiological response personnel, a request will be forwarded to the State EOC for the additional resources. The request will contain a description of the problem, type of resources needed, which state has the resources, where the resources need to be delivered, clear direction to assembly point or point of delivery, estimated time the resources will be needed and if resources include people, what arrangements have been made for housing, etc.

If the Governor, State Coordinating Officer, or designee concurs with the need for assistance as requested, the Governor, the State Coordinating Officer or designee will contact the Governor or designee of the Emergency Management Assistance Compact state that has the resources and request the specified assistance.

The provisions of the National Response Framework will be used for federal interagency coordination for radiological emergency response.

| | |
|-----------------------|----------------|
| Citrus County: | Not Applicable |
| Levy County: | Not Applicable |
| Marion County: | Not Applicable |

Plan Reference

State of Florida Plan references:

- Chapter 9 sections IV.A and B

Criterion Evaluation

| | |
|-------------------|-----------------------|
| State of Florida: | Adequate |
| Citrus County: | Not Applicable |
| Levy County: | Not Applicable |
| Marion County: | Not Applicable |

- C.1.b.** Evaluation Criterion: specific Federal resources expected, including expected times of arrival at specific nuclear facility sites.

Criterion Statement

State of Florida: Plans are adequate. The provisions of the National Response Framework will be used for federal interagency coordination for radiological emergency response if Federal assets are requested for an incident. Expected arrival times of responding assets would travel dependent.

Citrus County: Not Applicable
Levy County: Not Applicable
Marion County: Not Applicable

Plan Reference

State of Florida Plan references:

- Chapter 9 section IV.B

Criterion Evaluation

State of Florida: Adequate
Citrus County: Not Applicable
Levy County: Not Applicable
Marion County: Not Applicable

- C.1.c.** Evaluation Criterion: specific licensee, State and local resources available to support the Federal response, e.g., airfields, command posts, telephone lines, radio frequencies and telecommunications centers.

Criterion Statement

State of Florida: Plans are adequate. Federal emergency response agencies dispatched to LNP will locate in close proximity. Federal PIOs will be located with the utility, State and local PIOs at the ENC. State and local emergency personnel will assist the Federal response agencies in establishing nursed operations.

Citrus County: Plans are adequate. The Citrus County REP Plan includes information on Federal response and facilities available for that use.

Levy County: Plans are adequate. Levy County has developed radiological emergency response plans for LNP that includes information on Federal response and facilities available for that use.

Marion County: Plans are adequate. Marion County has developed radiological emergency response plans for LNP that includes information on Federal response and facilities available for that use.

Plan Reference

State of Florida Plan references:

- REMP, App. VI section IX. G.

Citrus County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Levy County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Marion County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Criterion Evaluation

State of Florida: **Adequate**

Citrus County: **Adequate**

Levy County: **Adequate**

Marion County: **Adequate**

- C.2.a.** Evaluation Criterion: Each principal offsite organization may dispatch representatives to the licensee's near site Emergency Operations Facility. (State technical analysis representatives at the near site EOF are preferred.)

Criterion Statement

State of Florida: Plans are adequate. Upon activation of the licensee's EOF, representatives from the State, Levy, Citrus and Marion County will be dispatched to that facility. The State Incident Management Team (IMT) will travel by the most expeditious manner from Tallahassee to the affected licensee's emergency operations facility.

Citrus County: Plans are adequate. The Citrus County REP Plan includes information on procedures to send a representative to the EOF. The operational posture for the State of Florida and its counties is to send a decision maker to the EOF so that joint State and County protective action decisions can be made at the EOF.

Levy County: Plans are adequate. Levy County has developed site specific radiological emergency response plans for LNP that include information on plans to send a representative to the EOF. The operational posture for the State of Florida and its counties is to send a decision maker to the EOF so that joint State and County protective action decisions can be made at the EOF.

Marion County: Plans are adequate. Marion County has developed radiological emergency response plans for LNP. The operational posture for the State of Florida and its counties is to send a decision maker to the EOF so that joint State and County protective action decisions can be made at the EOF.

Plan Reference

State of Florida Plan references:

- REMP, App. VI section IX. C.

Citrus County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Levy County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Marion County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- C.3.** Evaluation Criterion: Each organization shall identify radiological laboratories and their general capabilities and expected availability to provide radiological monitoring and analyses services which can be used in an emergency.

Criterion Statement

State of Florida: Plans are adequate. The Bureau of Radiation Control has a radio-chemistry laboratory in Orlando with a full range of capability for analysis of environmental media. The major analytical systems and capabilities are outlined in the plan. The state also maintains a Mobile Emergency Radiological Laboratory that will be dispatched to the vicinity of the power plant at the time of an emergency. The mobile laboratory has a wide range of capability for analysis of environmental media. The mobile laboratory is self-contained and may be operated without support services when necessary. The state will analyze collected samples at the Department of Health's Health Physics Lab (Orlando), and the Mobile Emergency Radiological Lab.

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|-----------------------|-----------------------|
| Citrus County: | Not Applicable |
| Levy County: | Not Applicable |
| Marion County: | Not Applicable |

Plan Reference

State of Florida Plan references:

- Chapter 8 section V

Criterion Evaluation

| | |
|-------------------|-----------------------|
| State of Florida: | Adequate |
| Citrus County: | Not Applicable |
| Levy County: | Not Applicable |
| Marion County: | Not Applicable |

- C.4.** Evaluation Criterion: Each organization shall identify nuclear and other facilities, organizations or individuals which can be relied upon in an emergency to provide assistance. Such assistance shall be identified and supported by appropriate letters of agreement.

Criterion Statement

State of Florida: Plans are adequate. State plans identify facilities and organizations that may be relied upon to provide emergency assistance and the level of assistance each will provide.

Citrus County: Plans are adequate. Plan identifies Letters of Agreement and other documents needed to provide emergency response support for an incident at LNP need.

Levy County: Plans are adequate. Plan identifies Letters of Agreement and other documents needed to provide emergency response support for an incident at LNP need.

Marion County: Plans are adequate. Plan identifies Letters of Agreement and other documents needed to provide emergency response support for an incident at LNP need.

Plan Reference

State of Florida Plan references:

- REMP, App. VI sections II, IX. G. and XIII

Citrus County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Levy County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Marion County Plan references:

- Radiological Emergency Preparedness Plan
- CEMP

Criterion Evaluation

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|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

D. **Emergency Classification System Planning Standard:** A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by the facility licensees for determinations of minimum initial offsite response measures.

D.3. Evaluation Criterion: Each State and local organization shall establish an emergency classification and emergency action level scheme consistent with that established by the facility licensee.

Criterion Statement

State of Florida: Plans are adequate. The Nuclear Regulatory Commission has established four classes of emergency in increasing order of significance: Notification of Unusual Event (NUE), Alert, Site Area Emergency (SAE), and General Emergency (GE). Progression is provided to ensure adequate emergency management preparations are taken for more serious event indicators. Based on plant conditions, licensees will classify the event, make offsite notification of the emergency classification level (i.e., Unusual Event, Alert, Site Area Emergency, or General Emergency) and make a protective action recommendation if required. When the emergency operations facility is not operational and there is no signed Executive Order by the Governor, the risk counties will maintain primary responsibility for coordinating emergency response with the State Emergency Operations Center and the licensee. Once the Governor has signed an Executive Order, an emergency classification with protective action recommendations by licensees will require joint state and local coordination to implement a protective action decision.

Citrus County: Plans are adequate. Citrus County has developed radiological emergency response plans for LNP that categorizes radiological accidents into one of the four Emergency Classification Level (ECL) Notification of Unusual Event (NUE), Alert, Site Area Emergency (SAE), and General Emergency (GE) in which the ECL level determines the degree of licensee, State, and local response.

Levy County: Plans are adequate. Levy County has developed radiological emergency response plans for LNP that categorizes radiological accidents into one of the four ECL, NUE, Alert, SAE, and GE in which the ECL level determines the degree of licensee, State, and local response.

Marion County: Plans are adequate. Marion County has developed radiological emergency response plans for the LNP that categorizes radiological accidents into one of

the four ECL, NUE, Alert, SAE, and GE in which the ECL level determines the degree of licensee, State, and local response.

Plan Reference

State of Florida Plan references:

- REMP, App. VI sections IV

Citrus County Plan references:

- Radiological Emergency Response Plan

Levy County Plan references:

- Radiological Emergency Response Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- D.4.** Evaluation Criterion: Each State and local organization should have procedures in place that provide for emergency actions to be taken which are consistent with the emergency actions recommended by the nuclear facility licensee, taking into account local offsite conditions that exist at the time of the emergency.

Criterion Statement

State of Florida: Plans are adequate. The state will function under the following levels of activation for each ECL as indicated. Levels of Activation are as follows:

- Level 3 - Monitoring - If a licensee declares an Unusual Event, the State EOC will remain at a level 3.
- Level 2 - Partial Activation - If a licensee declares an Alert, the State Emergency Operations Center may be partially activated and staffed by selected ESF based on plant conditions, mission specific tasks or other concurrent events.
- Level 1 - Full Activation - If a licensee declares a Site Area Emergency or General Emergency classification, the State EOC will be fully activated and staffed by all ESF and other stakeholders necessary to manage the State response.

Citrus County: Plans are adequate. Citrus County has developed radiological emergency response plans for LNP that outlines the licensee protective actions, State actions, and local actions by ECL.

Levy County: Plans are adequate. Levy County has developed radiological emergency response plans for LNP that outlines the licensee protective actions, State actions, and local actions by ECL.

Marion County: Plans are adequate. Marion County has developed radiological emergency response plans for the LNP that outlines the licensee protective actions, State actions, and local actions by ECL.

Plan Reference

State of Florida Plan references:

- Chapter 4, sections I, II and III
- Chapter 5, section I
- REMP, App. VI sections V

Citrus County Plan references:

- Radiological Emergency Response Plan

Levy County Plan references:

- Radiological Emergency Response Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

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|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

E. Notification Methods and Procedures

Planning Standard: Procedures have been established for notification, by the licensee of State and local response organizations and for notification of emergency personnel by all response organizations; the content of initial and follow-up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established.

- E.1.** Each organization shall establish procedures that describe mutually agreeable bases for notification of response organizations consistent with the emergency classification and action level scheme set forth in Appendix 1. These procedures shall include means for verification of messages. The specific details of verification need not be included in the plan.

Criterion Statement

State of Florida: Plans are adequate. The State of Florida Division of Emergency Management's State Watch Office is the designated point of contact in the event of a

radiological emergency. As such, the Division of Emergency Management is responsible for receiving notification of an emergency from the nuclear power plants, verifying information contained in the notification messages, and alerting appropriate state, local, and federal emergency response personnel. The State Watch Office communications operators are on duty at the State EOC on a 24-hour basis and will be initially alerted by LNP using the Hot Ring Down telephone system with commercial telephone as the secondary notification system. The State Warning Point will verify receipt of the message by each county. Local response organizations will be notified of the emergency by the county warning points. To ensure that the state has the capability to respond to an emergency situation on a 24-hour basis, the State Emergency Response Team can be activated in the event resources are needed to supplement local governments. The emergency coordinating officers for each emergency support function will be responsible for alerting and activating necessary support personnel.

Citrus County: Plans are adequate. Citrus County has developed LNP specific response plans that identify a clear and consistent means of emergency notifications with all responding organizations for a LNP response.

Levy County: Plans are adequate. Levy County has developed LNP specific response plans that identify a clear and consistent means of emergency notifications with all responding organizations for a LNP response.

Marion County: Plans are adequate. Marion County has developed LNP specific response plans that identify a clear and consistent means of emergency notifications with all responding organizations for a LNP response.

Plan Reference

State of Florida Plan references:

- Chapter 5, sections I & II
- REMP, App. VI section V

Citrus County Plan references:

- Radiological Emergency Response Plan
- CEMP

Levy County Plan references:

- Radiological Emergency Response Plan
- CEMP

Marion County Plan references:

- Radiological Emergency Response Plan
- CEMP

Criterion Evaluation

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|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |

Marion County: **Adequate**

- E.2** Each organization shall establish procedures for alerting, notifying, and mobilizing emergency response personnel.

Criterion Statement

State of Florida: Plans are adequate. The emergency coordinating officers for each emergency support function will be responsible for alerting and activating necessary support personnel via commercial telephone and agency radio systems. The state will function under the following levels of activation for each ECL as indicated. Levels of Activation are as follows:

Level 3 - Monitoring - If a licensee declares an Unusual Event, the State EOC will remain at a level 3.

Level 2 - Partial Activation - If a licensee declares an Alert, the State Emergency Operations Center may be partially activated and staffed by selected ESF based on plant conditions, mission specific tasks or other concurrent events.

Level 1 - Full Activation - If a licensee declares a Site Area Emergency or General Emergency classification, the State EOC will be fully activated and staffed by all ESF and other stakeholders necessary to manage the State response.

Citrus County: Plans are adequate. County plans outline the means and procedures for alerting, notifying and mobilizing emergency response personnel at each ECL for an LNP specific incident.

Levy County: Plans are adequate. County plans outline the means and procedures for alerting, notifying and mobilizing emergency response personnel at each ECL for an LNP specific incident.

Marion County: Plans are adequate. County plans outline the means and procedures for alerting, notifying and mobilizing emergency response personnel at each ECL for an LNP specific incident.

Plan Reference

State of Florida Plan references:

- Chapter 5, sections I & II
- Chapter 6, sections I, II & III
- REMP, App. VI section V

Citrus County Plan references:

- Radiological Emergency Response Plan

Levy County Plan references:

- Radiological Emergency Response Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- E.5** State and local government organizations shall establish a system for disseminating to the public appropriate information contained in initial and follow up messages received from the licensee, including the appropriate notification to appropriate broadcast media, e.g., the Emergency Broadcast System (EBS).

Criterion Statement

State of Florida: Plans are adequate. Risk counties will implement procedures to provide notification and clear instructions, including periodic status updates, to the general public. The public notification system may be activated for an Alert, and will be activated for a SAE or a GE in a timely manner and without any undo delay upon the decision by the risk county Chairpersons or their designees.

Means of providing notification to the general public will include the activation of the outdoor siren systems, the Emergency Alert System, the National Oceanic and Atmospheric Administration Very High Frequency Radio Network, participating local radio and television stations, and route alerting. The risk county(s) will be responsible for coordination and development of written messages that will be provided to the general public during an emergency. The Division of Emergency Management will coordinate with affected counties to provide assistance as needed and provide periodic status updates to the general public.

Listings of television and radio stations that will broadcast the public notifications are included in Appendix VI section VI of the State plan.

Citrus County: Plans are adequate. County plans state Progress Energy has installed sirens for notification of the public within the 10-mile Emergency Planning Zone. The Director of Emergency Operations in Citrus County or designee, under the direction of the Chairperson of the Board of County Commissioners will be responsible for activating the siren system. Residents and transients within the 10-mile Emergency Planning Zone will be advised to tune to a specific Emergency Alert System station for detailed information and instructions.

Levy County: County will install sirens for notification of the public within the 10-mile Emergency Planning Zone. The Director of Emergency Management in Levy County or designee, under the direction of the Chairperson for the Board of County Commissioners

will be responsible for activating the siren system. Residents and transients within the 10-mile Emergency Planning Zone will be advised to tune to a specific Emergency Alert System station for detailed information and instructions.

Marion County: County will install sirens for notification of the public within the 10-mile Emergency Planning Zone. The Director of Emergency Management in Marion County or designee, under the direction of the Chairperson for the Board of County Commissioners will be responsible for activating the siren system. Residents and transients within the 10-mile Emergency Planning Zone will be advised to tune to a specific Emergency Alert System station for detailed information and instructions.

Plan Reference

State of Florida Plan references:

- Chapter 5, section III
- Chapter 7, section VII
- App. VI section VI

Citrus County Plan references:

- Radiological Emergency Response Plan

Levy County Plan references:

- Radiological Emergency Response Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

| | |
|-------------------|--|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | See Post COL Reasonable Assurance Tracking Form |
| Marion County: | See Post COL Reasonable Assurance Tracking Form |

- E.6** Each organization shall establish administrative and physical means, and the time required for notifying and providing prompt instruction to the public within the plume exposure pathway Emergency Planning Zone. It shall be the licensee's responsibility to demonstrate that such means exist, regardless of who implements this requirement. It shall be the responsibility of the State and local governments to activate such a system.

Criterion Statement

State of Florida: Plans are adequate. The Division of Emergency Management will coordinate with affected counties to provide assistance as needed and provide periodic status updates to the general public. Risk counties will implement procedures to provide notification and clear instructions, including periodic status updates, to the general public. The public notification system may be activated for an Alert, and will be activated for a SAE or a GE in a timely manner and without any undo delay upon the decision by the risk county Chairpersons or their designees.

Sirens for notification of the public within the 10 mile EPZ will be installed by Progress Energy and the EM directors (or designee) of Citrus, Levy and Marion Counties will be responsible for activating the siren system. The plan also lists television and radio stations that will broadcast the public notifications for those counties and addresses backup route alerting in the event of siren failure.

Citrus County: Plans are adequate. County plans state the public notification system may be activated for an Alert, and will be activated for a Site Area Emergency or a General Emergency in a timely manner following a decision by the Chairpersons of the Citrus County Board of County Commissioners or their designees, to implement Protective Action Recommendations. The population within the 10-mile Emergency Planning Zone should receive primary notification and instructions via all primary notification systems for the general population, including the Emergency Alert System. Backup route alerting and notification shall be completed within 45 minutes.

Levy County: Plans are adequate. County plans state the public notification system may be activated for an Alert, and will be activated for a Site Area Emergency or a General Emergency in a timely manner following a decision by the Chairpersons of the Levy County Board of County Commissioners or their designees, to implement Protective Action Recommendations. The population within the 10-mile Emergency Planning Zone should receive primary notification and instructions via all primary notification systems for the general population, including the Emergency Alert System. Backup route alerting and notification shall be completed within 45 minutes.

Marion County: Plans are adequate. County plans state the public notification system may be activated for an Alert, and will be activated for a Site Area Emergency or a General Emergency in a timely manner following a decision by the Chairpersons of the Marion County Board of County Commissioners or their designees, to implement Protective Action Recommendations. The population within the 10-mile Emergency Planning Zone should receive primary notification and instructions via all primary notification systems for the general population, including the Emergency Alert System. Backup route alerting and notification shall be completed within 45 minutes.

Plan Reference

State of Florida Plan references:

- Chapter 5, section III
- Chapter 7, section VII
- App. VI, section VI

Citrus County Plan references:

- Radiological Emergency Response Plan

Levy County Plan references:

- Radiological Emergency Response Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- E.7** Each organization shall provide written messages intended for the public, consistent with the licensee's classification scheme. In particular, draft messages to the public giving instructions with regard to specific protective actions to be taken by occupants of affected areas shall be prepared and included as part of the State and local plans. Such messages should include the appropriate aspects of sheltering, ad hoc respiratory protection, e.g., handkerchief over mouth, thyroid blocking, or evacuation. The role of the licensee is to provide supporting information for the messages. For ad hoc respiratory protection see "Respiratory Protective Devices Manual" American Industrial Hygiene Association, 1963, pp. 123–126.

Criterion Statement

State of Florida: Plans are adequate. Pre-scripted EAS messages are included as figures in Chapter 7 of the state plan. These messages include identification of the state authority, the nuclear power plant, statement of a level of emergency, reference information and closing statement. To ensure public understanding of emergency protective action instructions, the Public Information Officers of each county, State and licensee will obtain information about their respective response activities and disseminate it to the media for broadcast.

State of Florida REMP, App. VI sections VI and VIII state pre-scripted EAS messages for Citrus, Levy and Marion Counties are maintained in the respective SOPs. To ensure public understanding of emergency protective action instructions, the Public Information Officers of each county, State and licensee will obtain information about their respective response activities and disseminate it to the media for broadcast.

Citrus County: Plans are adequate. County plans include LNP specific pre-scripted EAS messages and information to ensure public understanding of emergency protective actions. Pre-scripted Emergency Alert System messages for Citrus County are maintained in the county's respective Standard Operating Procedures.

Levy County: Plans are adequate. County plans include LNP specific pre-scripted EAS messages and information to ensure public understanding of emergency protective actions. Pre-scripted Emergency Alert System messages for Levy County are maintained in the county's respective Standard Operating Procedures.

Marion County: County will develop specific pre-scripted EAS messages and information to ensure public understanding of emergency protective actions. Pre-scripted Emergency Alert System messages for Marion County are maintained in the county's respective

Standard Operating Procedures.

Plan Reference

State of Florida Plan references:

- Chapter 7, Figures 7-1 through 7-8
- App. VI section VI

Citrus County Plan references:

- Radiological Emergency Response Plan

Levy County Plan references:

- Radiological Emergency Response Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

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|-------------------|--|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | See Post COL Reasonable Assurance Tracking Form |

F. Emergency Communications

Planning Standard: Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.

F.1 The communication plans for emergencies shall include organizational titles and alternates for both ends of the communication links. Each organization shall establish reliable primary and backup means of communication for licensees, local, and State response organizations. Such systems should be selected to be compatible with one another. Each plan shall include:

F.1.a. Evaluation Criterion: Provision for 24-hour per day notification to and activation of the State/local emergency response network; and at a minimum, a telephone link and alternate, including 24-hour per day manning of communications links that initiate emergency response actions.

Criterion Statement

State of Florida: Plans are adequate. The Division of Emergency Management operates a 24-hour emergency communications center at the State EOC called the State Watch Office. The State Watch Office also serves as Florida's contact point for communications between local, state and federal governments and emergency response agencies. The State Watch Office is equipped with multiple communications networks composed of local, state and federal emergency communications systems to include: the Hot Ring Down telephone system, commercial telephones and Emergency Satellite Communications System.

Citrus County: Plans are adequate. Plan states 24- hour communications in Citrus County are provided through the Sheriff's Office via the Hot Ring Down telephone system, commercial telephones, and Emergency Satellite Communication System.

Levy County: Plans are adequate. Plan states 24- hour communications in Levy County are provided through the Sheriff's Office via the Hot Ring Down telephone system, commercial telephones, and Emergency Satellite Communication System.

Marion County: Plans are adequate. Plan states 24- hour communications in Marion County are provided through the Sheriff's Office via the Hot Ring Down telephone system, commercial telephones, and Emergency Satellite Communication System.

Plan Reference

State of Florida Plan references:

- Chapter 5, section I
- Chapter 6, section II

Citrus County Plan references:

- Radiological Emergency Response Plan

Levy County Plan references:

- Radiological Emergency Response Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

F.1.b. Evaluation Criterion: Provision for communications with contiguous State/local governments within the Emergency Planning Zones;

Criterion Statement

State of Florida: Plans are adequate. The State Watch Office serves as Florida's contact point for communications between local, state and federal governments and emergency response agencies. Communications with local emergency response agencies will be maintained by agency radio systems and commercial telephone.

Citrus County: Plans are adequate. The county plan states communications with Levy and Marion counties will be maintained via the Hot Ring Down telephone system, commercial telephones, or Emergency Satellite Communication System.

Communications with local emergency response agencies will be maintained by agency radio systems and commercial telephone.

Levy County: Plans are adequate. The county plan states communications with Citrus and Marion counties will be maintained via the Hot Ring Down telephone system, commercial telephones, or Emergency Satellite Communication System.

Communications with local emergency response agencies will be maintained by agency radio systems and commercial telephone.

Marion County: Plans are adequate. Communications with Citrus and Levy counties is the County 911 Center.

Communications with local emergency response agencies will be maintained by agency radio systems and commercial telephone.

Plan Reference

State of Florida Plan references:

- Chapter 6, section III

Citrus County Plan references:

- Radiological Emergency Response Plan

Levy County Plan references:

- Radiological Emergency Response Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

F.1.c. Evaluation Criterion: Provision for communications as needed with Federal emergency response organizations;

Criterion Statement

State of Florida: Plans are adequate. The State Watch Office serves as Florida's contact point for communications between local, state and federal governments and emergency response agencies. Specific communications with Federal emergency response agencies will be coordinated through the State Division of Emergency Management.

Citrus County: Plans are adequate. County plan states communications with Federal emergency response agencies will be coordinated through the State Division of Emergency Management.

Levy County: Plans are adequate. County plan states communications with Federal emergency response agencies will be coordinated through the State Division of Emergency Management.

Marion County: Plans are adequate. County plan states communications with Federal emergency response agencies will be coordinated through the State Division of Emergency Management.

Plan Reference

State of Florida Plan references:

- Chapter 6, section III.B

Citrus County Plan references:

- Radiological Emergency Response Plan

Levy County Plan references:

- Radiological Emergency Response Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

F.1.d. Evaluation Criterion: Provision for communications between the nuclear facility and the licensee's near-site Emergency Operations Facility, State and local emergency operations centers, and radiological monitoring teams;

Criterion Statement

State of Florida: Plans are adequate. The State Watch Office serves as Florida's contact point for communications between local, state and federal governments and emergency response agencies. Proposed communications with LNP will be maintained via the Hot Ring Down telephone system, commercial telephones and Emergency Satellite Communication System. The Department of Health utilizes the State Law Enforcement Radio System as the primary form of communication between the Mobile Emergency Radiological Laboratory, radiological field monitoring teams, the emergency operations facility and others. Backup communication systems include satellite telephones/radio systems and cellular telephones.

Citrus County: Plans are adequate. The Citrus County plan states direct communications between the Citrus County Emergency Operations Center and the Levy Nuclear Plant is via the Hot Ring Down telephone system, commercial telephones, and Emergency Satellite Communication System.

Levy County: Plans are adequate. The Levy County plan states direct communications between the Levy County Emergency Operations Center and the Levy Nuclear Plant is via the Hot Ring Down telephone system, commercial telephones, and Emergency Satellite Communication System.

Marion County: Plans are adequate. The Marion County plan states direct communications between the Citrus County Emergency Operations Center and the Levy Nuclear Plant is via the Hot Ring Down telephone system, commercial telephones, and Emergency Satellite Communication System.

Plan Reference

State of Florida Plan references:

- Chapter 6, section III.A, D, F & H

Citrus County Plan references:

- Radiological Emergency Response Plan

Levy County Plan references:

- Radiological Emergency Response Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

F.1.e. Evaluation Criterion: Provision for alerting or activating emergency personnel in each response organization; and

Criterion Statement

State of Florida: Plans are adequate. The emergency coordinating officers for each emergency support function will be responsible for alerting and activating necessary support personnel via commercial telephone and agency radio systems. The state will function under the following levels of activation for each ECL as indicated. Levels of Activation are as follows:

Level 3 - Monitoring - If a licensee declares an Unusual Event, the State EOC will remain at a level 3.

Level 2 - Partial Activation - If a licensee declares an Alert, the State Emergency Operations Center may be partially activated and staffed by selected ESF based on plant conditions, mission specific tasks or other concurrent events.

Level 1 - Full Activation - If a licensee declares a Site Area Emergency or General Emergency classification, the State EOC will be fully activated and staffed by all ESF and other stakeholders necessary to manage the State response.

Citrus County: Plans are adequate. County REP plan states command and control of county emergency operations and emergency personnel will emanate from the county Emergency Operations Center. The county Emergency Operations Center in conjunction with the Sheriff's Dispatch Center will provide a focus for all county communications for emergency operations. Additionally, communications with local emergency response agencies will be maintained by agency radio systems and commercial telephone.

Levy County: Plans are adequate. County REP plan states command and control of county emergency operations and emergency personnel will emanate from the county Emergency Operations Center. The county Emergency Operations Center in conjunction with the Sheriff's Dispatch Center will provide a focus for all county communications for emergency operations. Additionally, communications with local emergency response agencies will be maintained by agency radio systems and commercial telephone.

Marion County: Plans are adequate. County REP plan states command and control of county emergency operations and emergency personnel will emanate from the county Emergency Operations Center. The county Emergency Operations Center in conjunction with the Sheriff's Dispatch Center will provide a focus for all county communications for emergency operations.

Plan Reference

State of Florida Plan references:

- Chapter 6, sections II and III

Citrus County Plan references:

- Radiological Emergency Response Plan

Levy County Plan references:

- Radiological Emergency Response Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

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|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- F.2.** Evaluation Criterion: Each organization shall ensure that a coordinated communication link for fixed and mobile medical support facilities exists.

Criterion Statement

State of Florida: Plans are adequate. The State Watch Office serves as Florida's contact point for communications between local, state and federal governments and emergency response agencies. Communications to medical facilities and ambulance services are available through the consolidated communications section. The State Watch Office is equipped with multiple communications networks composed of local, state and federal emergency communications systems to include but not limited to commercial telephone, cellular phone and local agency radio.

Citrus County: Plans are adequate. County plan states communications with local emergency response agencies will be maintained by agency radio systems and commercial telephone.

Levy County: Plans are adequate. County plan states communications with local emergency response agencies will be maintained by agency radio systems and commercial telephone.

Marion County: Plans are adequate. County plan states communications with local emergency response agencies will be maintained by agency radio systems and commercial telephone.

Plan Reference

State of Florida Plan references:

- Chapter 6, section III.B and C

Citrus County Plan references:

- Radiological Emergency Response Plan

Levy County Plan references:

- Radiological Emergency Response Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

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|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- F.3.** Evaluation Criterion: Each organization shall conduct periodic testing of the entire emergency communications system (see evaluation criteria N.2.a, N.2.d and Appendix 3¹).

Criterion Statement

State of Florida: Plans are adequate. Plans indicate testing of communication systems will be conducted daily, weekly, monthly or quarterly depending upon the network. A diagramed scheduled basis of testing is included as Figure 6-1 of Chapter 6, section IV.

Citrus County: Plans are adequate. Citrus County plans state testing of communication networks and equipment will be in accordance with procedures outlined in **Chapter 6** (Emergency Communications) of the State Annex and established county procedures.

Levy County: Plans are adequate. Levy County plans state testing of communication networks and equipment will be in accordance with procedures outlined in **Chapter 6** (Emergency Communications) of the State Annex and established county procedures.

Marion County: Plans are adequate. Marion County plans state testing of communication networks and equipment will be in accordance with procedures outlined in **Chapter 6** (Emergency Communications) of the State Annex and established county procedures.

Plan Reference

State of Florida Plan references:

- Chapter 6, section IV Figure 6-1

Citrus County Plan references:

- Radiological Emergency Response Plan

Levy County Plan references:

- Radiological Emergency Response Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

G. Public Education and Information

Planning Standard: Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g.,

¹ Revised by FEMA GM PR-1.

listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.

G.1. Evaluation Criterion: Each organization shall provide a coordinated periodic (at least annually) dissemination of information to the public regarding how they will be notified and what their actions should be in an emergency. This information shall include, but not necessarily be limited to:

- A. educational information on radiation;
- B. contact for additional information;
- C. protective measures, e.g., evacuation routes and relocation centers, sheltering, respiratory protection, radio-protective drugs; and
- D. protective measures related to the ingestion pathway²; and
- E. special needs of the handicapped.

Means for accomplishing the required dissemination prior to an emergency ¹ may include, but are not necessarily limited to: information in the telephone book; periodic information in utility bills; posting in public areas; and publications distributed on an annual basis.

Criterion Statement

State of Florida: Plans are adequate. The licensee and risk counties will coordinate information and materials released to the public to ensure residents and transients are advised of appropriate protective measures to take during a radiological emergency within the 10-mile emergency planning zone. Public education materials are revised and disseminated annually to businesses and residents within the 10-mile emergency planning zones of each nuclear power plant site in Florida. Each nuclear power plant also produces a site-specific public information booklet annually. The booklets provide, at a minimum, information pertaining to radiological concepts, Emergency Alert System stations, power plant operations, protective measures, evacuation routes, special needs populations and additional contact information. Additional presentations, detailed evacuation maps, press packets or other educational materials developed by the Division of Emergency Management in conjunction with the risk counties and licensees will be available.

Citrus County: Plans are adequate. The county REP plan states a coordinated dissemination of information will be conducted annually in the area surrounding the Levy Nuclear Plant to keep the residents and the media informed of the possible consequences of a Nuclear Power Plant emergency and the response plans for management of the emergency.

² Revised by FEMA GM IN-1.

Levy County: Plans are adequate. The county REP plan states a coordinated dissemination of information will be conducted annually in the area surrounding the Levy Nuclear Plant to keep the residents and the media informed of the possible consequences of a Nuclear Power Plant emergency and the response plans for management of the emergency.

Marion County: Plans are adequate. The county REP plan states a coordinated dissemination of information will be conducted annually in the area surrounding the Levy Nuclear Plant to keep the residents and the media informed of the possible consequences of a Nuclear Power Plant emergency and the response plans for management of the emergency.

Plan Reference

State of Florida Plan references:

- Chapter 7, section VII

Citrus County Plan references:

- Radiological Emergency Response Plan

Levy County Plan references:

- Radiological Emergency Response Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

State of Florida: **Adequate**

Citrus County: **Adequate**

Levy County: **Adequate**

Marion County: **Adequate**

- G.2.** Evaluation Criterion: The public information program shall provide the permanent and transient adult population within the plume exposure EPZ an adequate opportunity to become aware of the information annually. The programs should include provision for written material that is likely to be available in a residence during an emergency. Updated information shall be disseminated at least annually. Signs or other measures (e.g., decals, posted notices or other means. placed in hotels, motels, gasoline stations and phone booths) shall also be used to disseminate to any transient population within the plume exposure pathway EPZ appropriate information that would be helpful if an emergency or accident occurs. Such notices should refer the transient to the telephone directory or other source of local emergency information and guide the visitor to appropriate radio and television frequencies.

Criterion Statement

State of Florida: Plans are adequate. Appropriate public notices are posted in parks, beaches, and other outdoor recreational facilities within the 10-mile emergency planning

zone that are under the control of state and local government. These will inform the transient population of appropriate actions to take when they hear an emergency alert signal.

Citrus County: The county REP plan states Progress Energy, Marion, Levy, and Citrus counties will jointly develop and maintain a public information document containing appropriate educational material. This publication will include but not be limited to the following information:

1. Information about radiation.
2. The office and telephone number to contact for further information.
3. Information on protective measures, including evacuation routes, reception centers, sheltering, and the identification of radio stations that will be used to broadcast emergency information.
4. Specific information for the handicapped.

The information will be distributed to the permanent population within the 10-mile Emergency Planning Zone. Updated information will be provided at least annually.

Information documents will be distributed by Progress Energy to managers of transient lodging facilities within the 10-mile Emergency Planning Zone for use by transients. Appropriate public notices will be posted at beaches and other outdoor recreational facilities within the 10-mile Emergency Planning Zone that are under the control of state and local government. These will inform the transient population of appropriate actions to take when they hear an emergency alert signal (refer to **Chapter 7** of the State Annex).

Levy County: The county REP plan states Progress Energy, Marion, Levy, and Citrus counties will jointly develop and maintain a public information document containing appropriate educational material. This publication will include but not be limited to the following information:

1. Information about radiation.
2. The office and telephone number to contact for further information.
3. Information on protective measures, including evacuation routes, reception centers, sheltering, and the identification of radio stations that will be used to broadcast emergency information.
4. Specific information for the handicapped.

The information will be distributed to the permanent population within the 10-mile Emergency Planning Zone. Updated information will be provided at least annually.

Information documents will be distributed by Progress Energy to managers of transient lodging facilities within the 10-mile Emergency Planning Zone for use by transients. Appropriate public notices will be posted at beaches and other outdoor recreational facilities within the 10-mile Emergency Planning Zone that are under the control of state

and local government. These will inform the transient population of appropriate actions to take when they hear an emergency alert signal (refer to **Chapter 7** of the State Annex). County plans include LNP specific information on a coordinated periodic dissemination of information to the public.

Marion County: The county REP plan states Progress Energy, Marion, Levy, and Citrus counties will jointly develop and maintain a public information document containing appropriate educational material. This publication will include but not be limited to the following information:

1. Information about radiation.
2. The office and telephone number to contact for further information.
3. Information on protective measures, including evacuation routes, reception centers, sheltering, and the identification of radio stations that will be used to broadcast emergency information.
4. Specific information for the handicapped.

The information will be distributed to the permanent population within the 10-mile Emergency Planning Zone. Updated information will be provided at least annually.

Information documents will be distributed by Progress Energy to managers of transient lodging facilities within the 10-mile Emergency Planning Zone for use by transients. Appropriate public notices will be posted at beaches and other outdoor recreational facilities within the 10-mile Emergency Planning Zone that are under the control of state and local government. These will inform the transient population of appropriate actions to take when they hear an emergency alert signal (refer to **Chapter 7** of the State Annex).

Plan Reference

State of Florida Plan references:

- Chapter 7, section VII

Citrus County Plan references:

- Radiological Emergency Response Plan

Levy County Plan references:

- Radiological Emergency Response Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

| | |
|-------------------|---|
| State of Florida: | Adequate |
| Citrus County: | See Post COL Reasonable Assurance Tracking Chart |
| Levy County: | See Post COL Reasonable Assurance Tracking Chart |
| Marion County: | See Post COL Reasonable Assurance Tracking Chart |

G.3.a. Evaluation Criterion: Each principal organization shall designate the points of contact and physical locations for use by news media during an emergency.

Criterion Statement:

State of Florida: Plans are adequate. The emergency news center (ENC) serves as the focal point for news and information releases during an emergency. The licensee's emergency news center is located at the licensee's emergency operations facility (EOF).

Citrus County: Plans are adequate. The county REP plan states an Emergency News Center with accommodations for media representatives will be located adjacent to the licensee's Emergency Operations Facility. The Emergency News Center is also used for emergency response to support the Crystal River 3 Nuclear Plant. Public Information Officers from the licensee, State, Marion County, Levy County and Citrus County will report to the Emergency News Center upon notification of a Site Area Emergency or General Emergency, or for an Alert, if conditions warrant. The location of the Emergency News Center is shown in **Figure I-5**.

The Emergency News Center is the primary location for releasing information to the news media. At this location, public information staff (including technical experts) from the utility, state and counties will provide news releases. Official spokespersons from each organization will conduct periodic press conferences as conditions warrant (refer to **Chapter 7** of the State Annex).

Levy County: Plans are adequate. The county REP plan states an Emergency News Center with accommodations for media representatives will be located adjacent to the licensee's Emergency Operations Facility. The Emergency News Center is also used for emergency response to support the Crystal River 3 Nuclear Plant. Public Information Officers from the licensee, State, Marion County, Levy County and Citrus County will report to the Emergency News Center upon notification of a Site Area Emergency or General Emergency, or for an Alert, if conditions warrant. The location of the Emergency News Center is shown in **Figure I-5**.

The Emergency News Center is the primary location for releasing information to the news media. At this location, public information staff (including technical experts) from the utility, state and counties will provide news releases. Official spokespersons from each organization will conduct periodic press conferences as conditions warrant (refer to **Chapter 7** of the State Annex).

Marion County: Plans are adequate. The county REP plan states an Emergency News Center with accommodations for media representatives will be located adjacent to the licensee's Emergency Operations Facility. The Emergency News Center is also used for emergency response to support the Crystal River 3 Nuclear Plant. Public Information Officers from the licensee, State, Marion County, Levy County and Citrus County will report to the Emergency News Center upon notification of a Site Area Emergency or General Emergency, or for an Alert, if conditions warrant. The location of the Emergency News Center is shown in **Figure I-5**.

The Emergency News Center is the primary location for releasing information to the news media. At this location, public information staff (including technical experts) from the utility, state and counties will provide news releases. Official spokespersons from each organization will conduct periodic press conferences as conditions warrant (refer to **Chapter 7** of the State Annex).

Plan Reference

State of Florida Plan references:

- Chapter 7, section IV.B

Citrus County Plan references:

- Radiological Emergency Response Plan

Levy County Plan references:

- Radiological Emergency Response Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- G.4.a.** Evaluation Criterion: Each principal organization shall designate a spokesperson that should have access to all necessary information.

Criterion Statement

State of Florida: Plans are adequate. In the event of a nuclear power plant emergency the State Coordinating Officer or designee will be the official spokesperson for the State. A Public Information Officer will be deployed as a member of the Incident Management Team to the licensee's emergency news center.

Citrus County: Plans are adequate. The county REP plan states dissemination of information to the public and the news media will be coordinated by the public information officers from the licensee, State Division of Emergency Management and the Marion, Levy, and Citrus County Boards of County Commissioners. These individuals will obtain information about their respective emergency response activities and disseminate it to the media. A common center for news releases in the Levy Nuclear Plant area is the Emergency News Center located adjacent to the Emergency Operations Facility of Progress Energy (refer to **Chapter 7** of the State Annex).

Levy County: Plans are adequate. The county REP plan states dissemination of information to the public and the news media will be coordinated by the public information officers from the licensee, State Division of Emergency Management and the

Marion, Levy, and Citrus County Boards of County Commissioners. These individuals will obtain information about their respective emergency response activities and disseminate it to the media. A common center for news releases in the Levy Nuclear Plant area is the Emergency News Center located adjacent to the Emergency Operations Facility of Progress Energy (refer to **Chapter 7** of the State Annex).

Marion County: Plans are adequate. The county REP plan states dissemination of information to the public and the news media will be coordinated by the public information officers from the licensee, State Division of Emergency Management and the Marion, Levy, and Citrus County Boards of County Commissioners. These individuals will obtain information about their respective emergency response activities and disseminate it to the media. A common center for news releases in the Levy Nuclear Plant area is the Emergency News Center located adjacent to the Emergency Operations Facility of Progress Energy (refer to **Chapter 7** of the State Annex).

Plan Reference

State of Florida Plan references:

- Chapter 7, section II

Citrus County Plan references:

- Radiological Emergency Response Plan

Levy County Plan references:

- Radiological Emergency Response Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

G.4.b. Evaluation Criterion: Each organization shall establish arrangements for timely exchange of information among designated spokespersons.

Criterion Statement

State of Florida: Plans are adequate. The dissemination of information to the news media and public will be coordinated by the Public Information Officers from the state, counties, and licensees. Each Public Information Officer will collect information regarding emergency operations and protective actions decisions from their respective personnel in the emergency operations centers. The accuracy and validity of this information will be verified orally or by facsimile. Upon verification of information, the PIOs will develop coordinated news releases. The State Coordinating Officer or designee (when located at the emergency operations facility) and the Department of Health are

responsible for reviewing information and determining its validity and accuracy prior to the release of public information by the state.

Citrus County: Plans are adequate. The REP plan states the County Citizen's Information Center will be activated to answer public inquiries during an emergency. The Citizen's Information Center will be located in the county Emergency Operations Center, and will be operated on a 24-hour basis until the emergency has ended. Telephone numbers to call will be provided in media releases disseminated during the emergency.

Upon activation of the county Citizen's Information Center and the Florida Emergency Information Line for Rumor Control (Public Inquiry), a schedule will be established for the exchange and coordination of information in accordance with established procedures.

Levy County: Plans are adequate. The REP plan states the County Citizen's Information Center will be activated to answer public inquiries during an emergency. The Citizen's Information Center will be located in the county Emergency Operations Center, and will be operated on a 24-hour basis until the emergency has ended. Telephone numbers to call will be provided in media releases disseminated during the emergency.

Upon activation of the county Citizen's Information Center and the Florida Emergency Information Line for Rumor Control (Public Inquiry), a schedule will be established for the exchange and coordination of information in accordance with established procedures.

Marion County: Plans are adequate. The REP plan states the Marion County Citizen's Information Center will be activated to answer public inquiries during an emergency. The Citizen's Information Center will be located in the county Emergency Operations Center, and will be operated on a 24-hour basis until the emergency has ended. Telephone numbers to call will be provided in media releases disseminated during the emergency.

Upon activation of the county Citizen's Information Center and the Florida Emergency Information Line for Rumor Control (Public Inquiry), a schedule will be established for the exchange and coordination of information in accordance with established procedures.

Plan Reference

State of Florida Plan references:

- Chapter 7, section V

Citrus County Plan references:

- Radiological Emergency Preparedness Plan

Levy County Plan references:

- Radiological Emergency Preparedness Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

G.4.c. Evaluation Criterion: Each organization shall establish coordinated arrangements for dealing with rumors.

Criterion Statement

State of Florida: Plans are adequate. The Division of Emergency Management operates the 24-hour Florida Emergency Information Line to handle citizen inquiries during an emergency/disaster situation. The Florida Emergency Information Line telephone number and Telephone Device for the Deaf number will be released to the general public upon activation of the State Emergency Operations Center and/or the licensee's emergency news center. The coordination of rumor trends between the state and risk counties will occur with calls between representatives of the rumor control personnel for the Florida Emergency Information Line, the emergency news center, and the risk counties.

Citrus County: Plans are adequate. The county plan states upon activation of the county Citizen's Information Center and the Florida Emergency Information Line for Rumor Control (Public Inquiry), a schedule will be established for the exchange and coordination of information in accordance with established procedures.

Levy County: Plans are adequate. The county plan states upon activation of the county Citizen's Information Center and the Florida Emergency Information Line for Rumor Control (Public Inquiry), a schedule will be established for the exchange and coordination of information in accordance with established procedures.

Marion County: Plans are adequate. The county plan states upon activation of the county Citizen's Information Center and the Florida Emergency Information Line for Rumor Control (Public Inquiry), a schedule will be established for the exchange and coordination of information in accordance with established procedures.

Plan Reference

State of Florida Plan references:

- Chapter 7, section VI

Citrus County Plan references:

- Radiological Emergency Preparedness Plan

Levy County Plan references:

- Radiological Emergency Preparedness Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

State of Florida: **Adequate**
Citrus County: **Adequate**
Levy County: **Adequate**
Marion County: **Adequate**

- G.5.** Evaluation Criterion: Each organization shall conduct coordinated programs at least annually to acquaint news media with the emergency plans, information concerning radiation, and points of contact for release of public information.³

Criterion Statement

State of Florida: Plans are adequate. The State Division of Emergency Management, Progress Energy, Levy, Citrus and Marion counties will conduct coordinated programs to acquaint the news media with radiological plans and procedures for LNP on an annual basis.

Citrus County: Plans are adequate. The county REP plan states Progress Energy, Marion, Levy, and Citrus County and the Division of Emergency Management will conduct coordinated programs annually to acquaint the news media with the radiological emergency plans and procedures for the Levy Nuclear Plant. Information on radiation and the points of release of public information during an emergency will be presented.

Levy County: Plans are adequate. The county REP plan states Progress Energy, Marion, Levy, and Citrus County and the Division of Emergency Management will conduct coordinated programs annually to acquaint the news media with the radiological emergency plans and procedures for the Levy Nuclear Plant. Information on radiation and the points of release of public information during an emergency will be presented.

Marion County: Plans are adequate. The county REP plan states Progress Energy, Marion, Levy, and Citrus County and the Division of Emergency Management will conduct coordinated programs annually to acquaint the news media with the radiological emergency plans and procedures for the Levy Nuclear Plant. Information on radiation and the points of release of public information during an emergency will be presented.

Plan Reference

State of Florida Plan references:

- FL REMP, App. VI section VIII.B.

Citrus County Plan references:

³ Revised by FEMA GM PR-1.

- Radiological Emergency Preparedness Plan

Levy County Plan references:

- Radiological Emergency Preparedness Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

State of Florida: **Adequate**
Citrus County: **Adequate**
Levy County: **Adequate**
Marion County: **Adequate**

H. Emergency Facilities and Equipment

Planning Standard: Adequate emergency facilities and equipment to support the emergency response are provided and maintained.

- H.3 Evaluation Criterion: Each organization shall establish an emergency operations center for use in directing and controlling response functions.

Criterion Statement

State of Florida: Plans are adequate. State and local plans identify the locations of their respective EOCs. The Florida CEMP, Section IV states that the Florida EOC is located at 2575 Shumard Oak Boulevard, Tallahassee, Florida.

Citrus County: Plans are adequate. The Citrus County EOC is located at the Citrus County Sheriff's Office 3425 West Southern Street Lecanto, FL 34461. The alternate EOC for Citrus County will be the Lecanto Government complex, Room 280, located on 3600 W. Sovereign Path in Lecanto.

Levy County: Plans are adequate. The Levy County EOC is located at the Levy County Courthouse 355 South Court Street Bronson, FL 32621.

Marion County: Plans are adequate. The Marion County EOC is located at in the Sheriff's Office headquarters building located at 692 NW 30th Ave, in Ocala. In the event that the primary EOC becomes unusable, an alternate EOC is located in the City of Ocala Police Department, 402 S Pine Avenue, Ocala, FL 34474.

Plan Reference

State of Florida Plan references:

- FL CEMP
- FL REMF, Chapter 8, Section II A & B

Citrus County Plan references:

- CEMP

- Radiological Emergency Preparedness Plan

Levy County Plan references:

- CEMP
- Radiological Emergency Preparedness Plan

Marion County Plan references:

- CEMP
- Radiological Emergency Response Plan

Criterion Evaluation:

State of Florida: **Adequate**
Citrus County: **Adequate**
Levy County: **Adequate**
Marion County: **Adequate**

- H.4 Each organization shall provide for timely activation and staffing of the facilities and centers described in the plan.

Criterion Statement

State of Florida: Plans are adequate. The Florida CEMP states the following levels of activation are utilized in the State Emergency Operations Center:

a. Level III - Monitoring Activation - Level III is typically a "monitoring" phase. Notification will be made to those State agencies and Emergency Support Functions that would need to act as part of their everyday responsibilities. The State Emergency Operations Center will be staffed with State Warning Point Communicators and Division of Emergency Management personnel.

b. Level II - Partial Activation of the State Emergency Response Team - This is limited agency activation. All primary Emergency Support Functions are notified. The Division of Emergency Management personnel and the necessary Emergency Support Functions will staff the State Emergency Operations Center.

c. Level I - Full Scale Activation of the State Emergency Response Team - This is a full-scale activation with 24 hour staffing of the State Emergency Operations Center. All primary and support agencies under the State plan are notified.

Citrus County: Plans are adequate. The Citrus County REP Plan states the County Emergency Operations Center will be activated by the Emergency Operations Director, or designee, upon receipt of a Site Area Emergency notification. The Emergency Operations Center may be activated at the Alert emergency class upon the direction of the Chairperson, for the County Board of County Commissioners, if the situation warrants. Activation of the Emergency Operations Center will involve immediate staffing of designated personnel and notification of emergency response personnel who will be

placed on standby status, in accordance with established county procedures. Emergency equipment and supplies are listed in **Figure I-6**.

Levy County: Plans are adequate. The Levy County REP Plan states the Emergency Operations Center will be activated by the Emergency Operations Director, or designee, upon receipt of a Site Area Emergency notification. The Emergency Operations Center may be activated at the Alert emergency class upon the direction of the Chairperson, for the County Board of County Commissioners, if the situation warrants. Activation of the Emergency Operations Center will involve immediate staffing of designated personnel and notification of emergency response personnel who will be placed on standby status, in accordance with established county procedures. Emergency equipment and supplies are listed in **Figure I-6**.

Marion County: Plans are adequate. The Marion County REP Plan states the Marion County Emergency Operations Center will be activated by the Emergency Operations Director, or designee, upon receipt of a Site Area Emergency notification. The Emergency Operations Center may be activated at the Alert emergency class upon the direction of the Chairperson, Marion County Board of County Commissioners, if the situation warrants. Activation of the Emergency Operations Center will involve immediate staffing of designated personnel and notification of emergency response personnel who will be placed on standby status, in accordance with established county procedures. Emergency equipment and supplies are listed in **Figure I-6**.

Plan Reference

State of Florida Plan references:

- FL CEMP
- FL REMP, Chapter 8, Section II.A

Citrus County Plan references:

- Radiological Emergency Preparedness Plan

Levy County Plan references:

- Radiological Emergency Preparedness Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation:

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- H.7 Each organization, where appropriate, shall provide for offsite radiological monitoring equipment in the vicinity of the nuclear facility.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP states offsite monitoring equipment is available for the Department of Health's field teams in Orlando and Miami is outlined in Figure 8-2. Additional radiation survey instruments used in ongoing program activities are located in the Department's offices in Pensacola, Tallahassee, Ft. Myers, Tampa, Jacksonville, Miami, Orlando, Ft. Lauderdale, Lantana, and Winter Haven. Department of Health personnel will maintain inventories of offsite monitoring equipment. Means for equipment calibration, maintenance, and equipment operations are explained in the Bureau of Radiation Control's standard operating procedures.

Plan Reference

State of Florida Plan references:

- FL REMP, Chapter 8, Section V.B

Criterion Evaluation:

| | |
|-------------------|-----------------------|
| State of Florida: | Adequate |
| Citrus County: | Not Applicable |
| Levy County: | Not Applicable |
| Marion County: | Not Applicable |

- H.10 Each organization shall make provisions to inspect, inventory, and operationally check emergency equipment/instruments at least once each calendar quarter and after each use. There shall be sufficient reserves of instruments/equipment to replace those that are removed from emergency kits for calibration or repair. Calibration of equipment shall be at intervals recommended by the supplier of the equipment.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP states the Department of Health personnel will maintain inventories of offsite monitoring equipment. Means for equipment calibration, maintenance, and equipment operations are explained in the Bureau of Radiation Control's standard operating procedures.

Defective radiological monitoring instruments will be exchanged by the State Department of Health Radiological Instruments Maintenance and Calibration Facility in Orlando. Calibration of the instruments will be in accordance with intervals recommended by the suppliers.

The State of Florida is responsible for and maintains all radiological inventories for the counties.

Citrus County: Plans are adequate. The REP Plan states Citrus County has CDV-777 radiological emergency instrument response kits located in the Sheriff's Office EOC. Citrus County REP Coordinator or designee will inventory and inspect the radiological monitoring equipment after each exercise and at least quarterly to assure that they are

operational. Local operability checks will be performed on all monitoring equipment at least once each calendar quarter and after each use.

Dosimetry Kits and radiation instruments will be assigned to Fire Rescue/Special Operations team assigned to staff the Wash Down and Personnel Monitoring Stations. The emergency workers will verify the dosimeters are set to zero and fill out the included dose cards. The emergency workers will also perform a pre-operational check on their assigned instruments and determine the background readings prior to use.

Citrus County Radiological Emergency Equipment and Supplies inventory is located in the Citrus County REP Plan Figure 31.

Levy County: Plans are adequate. The REP Plan states the county will maintain radiological emergency response kits located in the EOC and inventory and inspect radiological monitoring equipment after each exercise and at least quarterly to assure that they are operational. Local operability checks will be performed on all monitoring equipment at least once each calendar quarter and after each use.

Radiological equipment and supplies inventory is located in the Levy County REP Plan Figure 6.

Marion County: Plans are adequate. The REP Plan states the county will maintain radiological emergency response kits located in the EOC and inventory and inspect radiological monitoring equipment after each exercise and at least quarterly to assure that they are operational. Local operability checks will be performed on all monitoring equipment at least once each calendar quarter and after each use.

Radiological equipment and supplies inventory is located in the Marion County REP Plan Figure 6.

Plan Reference

State of Florida Plan references:

- FL REMP, Chapter 8, Section V.B

Citrus County Plan references:

- Radiological Emergency Preparedness Plan

Levy County Plan references:

- Radiological Emergency Preparedness Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation:

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |

Marion County: **Adequate**

- H.11 Each plan shall, in an appendix, include identification of emergency kits by general category (protective equipment, communications equipment, radiological monitoring equipment, and emergency supplies).

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP Chapter 8 includes identification of emergency kits by general category (protective equipment, communications equipment, radiological monitoring equipment, and emergency supplies). The kits are located in the following offices: Pensacola, Tallahassee, Ft. Myers, Tampa, Jacksonville, Miami, Orlando, Ft. Lauderdale, Lantana, and Winter Haven.

Citrus County: Plans are adequate. The Citrus County REP Plan Figure 31 includes the identification of emergency kits by general category (protective equipment, communications equipment, radiological monitoring equipment, and emergency supplies).

Levy County: Plans are adequate. The Levy County REP Plan Figure 6 contains an appendix that identifies the availability and quantity of emergency kits by general category (protective equipment, communications equipment, radiological monitoring equipment, and emergency supplies).

Marion County: Plans are adequate. The Marion County REP Plan Figure 6 contains an appendix that identifies the availability and quantity of emergency kits by general category (protective equipment, communications equipment, radiological monitoring equipment, and emergency supplies).

Plan Reference

State of Florida Plan references:

- FL REMP, Chapter 8, Figures 8-1 through 8-4

Citrus County Plan references:

- Radiological Emergency Preparedness Plan

Levy County Plan references:

- Radiological Emergency Preparedness Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation:

State of Florida: **Adequate**
Citrus County: **Adequate**
Levy County: **Adequate**

Marion County: **Adequate**

- H.12 Each organization shall establish a central point (preferably associated with the licensee's near-site Emergency Operations Facility), for receipt and analysis of all field monitoring data and coordination of sample media.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 8 states the Bureau of Radiation Control has a radio-chemistry laboratory in Orlando with a full range of capability for analysis of environmental media. The major analytical systems and capabilities are outlined in Figure 8-1.

The Bureau of Radiation Control also maintains a Mobile Emergency Radiological Laboratory that will be dispatched to the vicinity of the power plant at the time of an emergency. The mobile laboratory provides a wide range of capability for analysis of environmental media and is provided with pre-designated parking locations near each reactor site. The mobile laboratory is self-contained and may be operated without support services when necessary.

The state will analyze collected samples at the Department of Health's Health Physics Lab (Orlando) and the Mobile Emergency Radiological Lab. Additional laboratory assistance may be requested from the United States Department of Energy and the Environmental Protection Agency. Implementation of the major analytical systems is explained in the Bureau of Radiation Control's Standard Operating Procedures. Additional laboratory assistance may be requested from the United States Department of Energy.

Citrus County: Not Applicable

Levy County: Not Applicable

Marion County: Not Applicable

Plan Reference

State of Florida Plan references:

- FL REMP, Chapter 8, V.A

Criterion Evaluation:

State of Florida: **Adequate**

Citrus County: **Not Applicable**

Levy County: **Not Applicable**

Marion County: **Not Applicable**

- I. Accident Assessment

Adequate methods, systems and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.

- I.7. Evaluation Criterion: Each organization shall describe the capability and resources for field monitoring within the plume exposure Emergency Planning Zone which are an intrinsic part of the concept of operations for the facility.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 9 states that field monitoring within the plume exposure pathway around nuclear power plant sites is provided by health physicists from the Florida Department of Health, Bureau of Radiation Control (BRC). Laboratory support and equipment available for use by field monitoring teams is identified Chapter 8. The specific systems and methods for radiation measurement, location and tracking of the radioactive plume, airborne radioiodine concentration measurement, and estimating integrated dose from actual and projected dose rates are outlined in BRC's standard operating procedures (SOPs).

Citrus County: Not Applicable

Levy County: Not Applicable

Marion County: Not Applicable

Plan Reference

State of Florida Plan references:

- Florida REMP, Chapter 8, Sections III and V, Figures 8-1 through 8-3
- Florida REMP, Chapter 9, Section III
- Florida REMP, Appendix VI, Section X
- BRC SOPs

Criterion Evaluation

| | |
|-------------------|-----------------------|
| State of Florida: | Adequate |
| Citrus County: | Not Applicable |
| Levy County: | Not Applicable |
| Marion County: | Not Applicable |

- I.8. Evaluation Criterion: Each organization, where appropriate, shall provide methods, equipment and expertise to make rapid assessments of the actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways. This shall include activation, notification means, field team composition, transportation, communication, monitoring equipment and estimated deployment times.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 9 describes the methods for activation and notification of field teams. Coordination of field assessment and monitoring activities is the responsibility of BRC. The state's capability for making accident assessments and performing field monitoring are described in BRC SOPs.

Citrus County: Not Applicable

Levy County: Not Applicable

Marion County: Not Applicable

Plan Reference

State of Florida Plan references:

- Florida REMP, Chapter 9
- Florida REMP, Appendix VI, Section X
- BRC SOPs

Criterion Evaluation

State of Florida: **Adequate**

Citrus County: **Not Applicable**

Levy County: **Not Applicable**

Marion County: **Not Applicable**

- I.9. Evaluation Criterion: Each organization shall have a capability to detect and measure radioiodine concentrations in air in the plume exposure EPZ as low as 10^{-7} uCi/cc (micro curies per cubic centimeter) under field conditions. Interference from the presence of noble gas and background radiation shall not decrease the stated minimum detectable activity.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 9, Section III.A states that field monitoring will be performed by BRC. BRC SOPs provide for the capability to detect and measure radioiodine at the required level.

Citrus County: Not Applicable

Levy County: Not Applicable

Marion County: Not Applicable

Plan Reference

State of Florida Plan references:

- Florida REMP, Chapter 9, Section III.A
- BRC SOPs

Criterion Evaluation

State of Florida: **Adequate**
Citrus County: **Not Applicable**
Levy County: **Not Applicable**
Marion County: **Not Applicable**

- I.10. Evaluation Criterion: Each organization shall establish means for relating the various measured parameters (e.g., contamination levels, water and air activity levels) to dose rates for key isotopes (i.e., those given in Table 3, page 18) and gross radioactivity measurements. Provisions shall be made for estimating integrated dose from the projected and actual dose rates and for comparing these estimates with the protective action guides. The detailed provisions shall be described in separate procedures.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 9, Section III.A states that field monitoring and dose assessment will be performed by BRC. BRC SOPs provide for the capability to perform the required dose assessments.

Citrus County: Not Applicable
Levy County: Not Applicable
Marion County: Not Applicable

Plan Reference

State of Florida Plan references:

- Florida REMP, Chapter 9, Section III.A
- BRC SOPs

Criterion Evaluation

State of Florida: **Adequate**
Citrus County: **Not Applicable**
Levy County: **Not Applicable**
Marion County: **Not Applicable**

- I.11. Evaluation Criterion: Arrangements to locate and track the airborne radioactive plume shall be made, using either or both Federal and State resources.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 9, Section III.A states that field monitoring will be performed by BRC. BRC SOPs provide for the capability to locate and track the plume. In addition, Florida REMP, Chapter 9, Section IV describes

how additional monitoring and assessment support would be obtained through mutual aid agreements and from the federal government.

Citrus County: Not Applicable

Levy County: Not Applicable

Marion County: Not Applicable

Plan Reference

State of Florida Plan references:

- Florida REMP, Chapter 9, Sections III.A and IV
- BRC SOPs

Criterion Evaluation

| | |
|-------------------|-----------------------|
| State of Florida: | Adequate |
| Citrus County: | Not Applicable |
| Levy County: | Not Applicable |
| Marion County: | Not Applicable |

J. Protective Response

Planning Standard: A range of protective actions have been developed for the plume exposure pathway EPZ for emergency workers and the public. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

- J.2. Evaluation Criterion: Each licensee shall make provisions for evacuation routes and transportation for onsite individuals to some suitable offsite location, including alternatives for inclement weather, high traffic density and specific radiological conditions.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP contains maps showing evacuation routes, evacuation areas, pre-selected monitoring and sampling points, reception centers and shelters in designated host areas and population distribution around each facility are included in each respective site plan. Each site plan includes means for the notification, protection and relocation of all segments of the resident and transient population including mobility-impaired persons. Additionally, each site plan includes evacuation time estimates. Each county will use the existing day-to-day means for dealing with potential impediments to evacuation and means for controlling access to evacuation areas.

Citrus County: Not Applicable

Levy County: Not Applicable

Marion County: Not Applicable

Plan Reference

State of Florida Plan references:

- Florida REMP, Appendix VI

Criterion Evaluation:

| | |
|-------------------|-----------------------|
| State of Florida: | Adequate |
| Citrus County: | Not Applicable |
| Levy County: | Not Applicable |
| Marion County: | Not Applicable |

- J.9. Evaluation Criterion: Each State and local organization shall establish a capability for implementing protective measures based upon protective action guides and other criteria. This shall be consistent with the recommendations of EPA regarding exposure resulting from passage of radioactive airborne plumes, (EPA-520/1-75-001) and with those of regarding radioactive contamination of human food and animal feeds as published in the Federal Register of December 15, 1978 (43 FR 58790).

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 11 states the decision to implement protective actions will be based on the comparison of numerous accident parameters (e.g., release duration and magnitude, weather conditions, etc.) to established protective action guides. Protective action guides for decision –making during the early phase intermediate phase, and for ingestion of contaminated agricultural products are identified in figures 11-1 through 11-3 respectively.

In coordination with the licensee, counties and federal agencies present, the Bureau of Radiation Control Operations Officer located at the licensee’s emergency operations facility will recommend protective actions to the impacted counties and the State Coordinating Officer or designee and the impacted counties will then make and implement joint protective action decisions.

Additionally, in circumstances where there is an immediate release of radioactive material, the State Emergency Response Team Chief present in the State Emergency Operations Center, or the senior government official in the county emergency operation center, can implement protective action decisions. Prior to the time when the Department of Health Operations Officer arrives at the licensee’s emergency operations facility, the licensee will be responsible for making protective action recommendations directly to the counties and advising the State Emergency Operation Center.

Citrus County: Plans are adequate. The State Department of Health (DOH) personnel will use EPA Protective Action Guide Manual 400-R-92-001 as a guide for recommending Protective Actions based on their analysis. Florida DOH Operations Officer will provide these recommendations to the Governors Authorized Representative.

Levy County: Plans are adequate. The Levy County REP Plan states the DOH personnel will use the Environmental Protection Agency's Protective Action Guide Manual 400-R-92-001 as guide for recommending protective actions based on their analysis. The Department of Health Operations Officer will provide these recommendations to the Governors Authorized Representative.

Marion County: Plans are Adequate. The Marion County REP Plan states the DOH personnel will use the Environmental Protection Agency's Protective Action Guide Manual 400-R-92-001 as guide for recommending protective actions based on their analysis. The Department of Health Operations Officer will provide these recommendations to the Governors Authorized Representative.

Plan Reference

Florida

- Florida REMP: Chapter 11

Citrus County

- Radiological Emergency Response Plan
- Florida REMP: Appendix VI

Levy County

- Radiological Emergency response plan
- Florida REMP: Appendix VI

Marion County

- Radiological Emergency Response Plan
- Florida REMP: Appendix VI

Criterion Evaluation:

| | |
|-------------------|------------------|
| State of Florida: | Adequate. |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- J.10. Evaluation Criterion: The organization's plans to implement protective measures for the plume exposure pathway shall include:
- J.10.a. Evaluation Criterion: Maps showing evacuation routes, evacuation areas, pre-selected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas; (identification of radiological sampling and monitoring points shall include the designators in Table J-1 or an equivalent uniform system described in the plan).

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP Appendix VI has maps showing evacuation routes, evacuation areas, pre-selected monitoring and sampling points, reception centers and shelters in designated host areas and population distribution around the facilities are included in each respective site plan. Each site plan includes means for the notification, protection and relocation of all segments of the resident and transient population including mobility-impaired persons. Each site plan also includes evacuation time estimates. Each county will use the existing day-to-day means for dealing with potential impediments to evacuation and means for controlling access to evacuation areas.

Citrus County: Plans are adequate. The Citrus County REP Plan contains all figures and maps for the plume exposure pathway.

Levy County: Plans are adequate. The Levy County REP Plan contains all figures and maps for the plume exposure pathway.

Marion County: Plans are adequate. The Marion County REP Plan contains all figures and maps for the plume exposure pathway.

Plan Reference

Florida

- State of Florida REMP:
- Florida REMP, Appendix VI Figures 13, 15, 17, 19, 20, 21, 22

Citrus County

- Citrus County REP Plan
- Florida REMP, Appendix VI Figures 13, 15, 17, 19, 20, 21, 22

Levy County

- Radiological Emergency Preparedness Plan
- Florida REMP, Appendix VI Figures 13, 15, 17, 19, 20, 21, 22

Marion County

- Radiological Emergency Preparedness Plan
- Florida REMP, Appendix VI Figures 13, 15, 17, 19, 20, 21, 22

Criterion Evaluation:

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

J.10.b. Evaluation Criterion: Maps showing population distribution around the nuclear facility. This shall be by evacuation areas (licensees shall also present the information in a sector format).

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Appendix VI maps showing evacuation routes, evacuation areas, pre-selected monitoring and sampling points, reception centers and shelters in designated host areas and population distribution around each facility are included in each respective site plan. Each site plan includes means for the notification, protection and relocation of all segments of the resident and transient population including mobility-impaired persons. Each site plan also includes evacuation time estimates. Each county will use the existing day-to-day means for dealing with potential impediments to evacuation and means for controlling access to evacuation areas.

Citrus County: Plans are adequate. Citrus County has developed an LNP specific plan with maps showing population distribution around the nuclear facility.

Levy County: Plans are adequate. Levy County has developed an LNP specific plan with maps showing population distribution around the nuclear facility.

Marion County: Plans are adequate. Marion County has developed an LNP specific plan with maps showing population distribution around the nuclear facility.

Plan Reference

Florida

- State of Florida REMP, Appendix VI

Citrus County

- Radiological Emergency Preparedness Plan
- Florida REMP, Appendix VI

Levy County

- Radiological Emergency Preparedness Plan
- Florida REMP, Appendix VI

Marion County

- Radiological Emergency Preparedness Plan
- Florida REMP, Appendix VI

Criterion Evaluation:

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

J.10.c. Evaluation Criterion: Means for notifying all segments of the transient and resident population.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 5 states risk counties will implement procedures to provide notification and clear instructions, including periodic status updates, to the general public within the plume exposure pathway. The public notification system may be activated for an Alert, and will be activated for a Site Area Emergency or a General Emergency in a timely manner and without any undo delay upon the decision by the Chairpersons of the risk counties, or their designees, to implement protective actions. Means of providing notification to the general public will include the activation of the public notification system which may include existing outdoor siren systems, the Emergency Alert System, the National Oceanic and Atmospheric Administration Very High Frequency Radio Network, participating local radio and television stations, and route alerting. The risk county(s) will be responsible for coordination and development of written messages that will be provided to the general public during an emergency. The division of Emergency Management will coordinate with affected counties, provide assistance as needed and provide periodic status updates to the general public.

Citrus County: Plans are adequate. The Citrus County REP Plan states Progress Energy has installed sirens for notification of the public within the 10-mile Emergency Planning Zone. The Director of Emergency Management in Marion County (or designee), the Director of Emergency Management in Levy County (or designee), and the Director of Emergency Operations in Citrus County (or designee), under the direction of the Chairperson of their respective Board of County Commissioners, will be responsible for activating the siren system. Residents and transients within the 10-mile Emergency Planning Zone will be advised to tune to the Emergency Alert System stations for detailed information and instructions.

As a backup, and for notification of isolated areas, sheriff's office/police and fire vehicles and aircraft equipped with public address systems will advise residents of the protective actions they should take based on the severity of the accident, in accordance with established county procedures.

Levy County: Plans are adequate. The Levy County REP Plan states Progress Energy has installed sirens for notification of the public within the 10-mile Emergency Planning Zone. The Director of Emergency Management in Marion County (or designee), the Director of Emergency Management in Levy County (or designee), and the Director of Emergency Operations in Citrus County (or designee), under the direction of the Chairperson of their respective Board of County Commissioners, will be responsible for activating the siren system. Residents and transients within the 10-mile Emergency Planning Zone will be advised to tune to the Emergency Alert System stations for detailed information and instructions.

As a backup, and for notification of isolated areas, sheriff's office/police and fire vehicles and aircraft equipped with public address systems will advise residents of the protective actions they should take based on the severity of the accident, in accordance with established county procedures.

Marion County: Plans are adequate. The Marion County REP Plan states Progress Energy will install sirens for notification of the public within the 10-mile Emergency Planning Zone. The Director of Emergency Management in Marion County (or designee), the Director of Emergency Management in Levy County (or designee), and the Director of Emergency Operations in Citrus County (or designee), under the direction of the Chairperson of their respective Board of County Commissioners, will be responsible for activating the siren system. Residents and transients within the 10-mile Emergency Planning Zone will be advised to tune to the Emergency Alert System stations for detailed information and instructions.

As a backup, and for notification of isolated areas, sheriff's office/police and fire vehicles and aircraft equipped with public address systems will advise residents of the protective actions they should take based on the severity of the accident, in accordance with established county procedures.

Plan Reference

Florida

- State of Florida REMP, Chapter 5

Citrus County

- Radiological Emergency Preparedness Plan
- REMP Section III 2.3, Section V, Figure 13
- Florida REMP, Appendix VI

Levy County

- Radiological Emergency Preparedness Plan
- CEMP
- Florida REMP, Appendix VI

Marion County

- Radiological Emergency Preparedness Plan
- Florida REMP, Appendix VI

Criterion Evaluation:

| | |
|-------------------|--|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | See Post COL Reasonable Assurance Tracking Form |

J.10.d Evaluation Criterion: Means for protecting those persons whose mobility may be impaired due to such factors as institutional or other confinement.

Criterion Statement

State of Florida: Plans are adequate. The state relies upon each county to have specific plans to deal with their populace. Each site plan includes means for the notification, protection and relocation of all segments of the resident and transient population including mobility-impaired persons. Potassium iodide can be used in those situations

where evacuation is not an acceptable protective action for populations that are difficult to move such as prison inmates, hospital and nursing home patients, or others with impaired mobility.

Citrus County: Plans are adequate. Citrus County REP Plan states mobility impaired residents who require special evacuation assistance should be registered with the Citrus County Sheriff's Office Emergency Management Division. Community Services has primary responsibility for safe movement of those people on the Special Needs list during an evacuation. When a decision to evacuate an area is made during an emergency, the Director of Emergency Management or designee will coordinate notification to the Community Services, Public School Board, and the Emergency Medical Services. **(Refer to REP SOP 5 "Special Needs")**.

Levy County: Plans are adequate. Levy County mobility impaired residents who require special evacuation assistance will be registered with Levy County Department of Emergency Management. If evacuation is necessary, these residents will be notified and transported by County school buses and ambulances if needed to the reception and shelter centers listed on Figure I-7. Those requiring hospitalization will be transported to Citrus Memorial Health Systems, Nature Coast Regional Hospital, or Munroe Regional Medical Center in Ocala, Florida. Those who have not registered for special evacuation assistance will be instructed to call the Marion County Emergency Management Office.

Marion County: Plans are adequate. Marion County mobility impaired residents who require special evacuation assistance will be registered with Marion County Department of Emergency Management. If evacuation is necessary, these residents will be notified and transported by County school buses and ambulances if needed to the reception and shelter centers listed on Figure I-7. Those requiring hospitalization will be transported to Citrus Memorial Health Systems, Nature Coast Regional Hospital, or Munroe Regional Medical Center in Ocala, Florida. Those who have not registered for special evacuation assistance will be instructed to call the Levy County Emergency Management Office.

Plan Reference

Florida

- State of Florida REMP: Chapter 10, Chapter 11
- Florida REMP: Appendix VI

Citrus County

- Radiological Emergency Preparedness Plan
- Florida REMP: Appendix VI

Levy County

- Radiological Emergency Preparedness Plan
- Florida REMP: Appendix VI

Marion County

- Radiological Emergency Preparedness Plan
- Florida REMP: Appendix VI

Criterion Evaluation:

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- J.10.e Evaluation Criterion: Provisions for the use of radioprotective drugs, particularly for emergency workers and institutionalized persons within the plume exposure EPZ whose immediate evacuation may be infeasible or very difficult, including quantities, storage, and means of distribution.

Criterion Statement

Florida: Plans are adequate. The Florida REMP states that during an incident where thyroid committed dose equivalent due to radioactive iodine is projected to be 5 rem or greater, actions to administer potassium iodide should be taken. The Bureau of Radiation Control Operations Officer will authorize the use of potassium iodide for emergency workers, difficult to move populations, and the general public.

The State has determined potassium iodide will be furnished for emergency workers and difficult to move people in accordance with the Bureau of Radiation Control's standard operating procedures.

Potassium iodide can be issued upon the recommendation of the Bureau of Radiation Control Operations Officer. Counties can then implement their own plans for dispensing potassium iodide.

Potassium iodide will be issued to members of the general public in accordance with the county health department's procedures. To provide for issuance to the public, doses are strategically stored near nuclear power plant sites. During an emergency, if supplies at one or more locations run low, additional supplies from other sites will be brought in.

Potassium iodide will be issued to members of the general public, in accordance with the Department of Health, Standard Operating Procedures and Chapter 10 (Radiological Exposure Control) and Chapter 11 (Protective Response) of the State Annex. To provide for issuance of potassium iodide to members of the public, doses have been procured. These doses are strategically located near nuclear power plant sites. During an emergency, if stocks at one or more locations run low, additional stocks from other sites will be brought in. The issuance of potassium iodide will be authorized by the Department of Health's Bureau of Radiation Control Operations Officer or designee.

Citrus County: Plans are adequate. KI will be administered only after receipt of a recommendation from the Fl. Dept. of Health/Bureau of Radiological Control and such authority through the Emergency Management Director or designee and the Chairperson of the Board of County Commissioners or designee. One dose of KI (130mg) daily for

two (2) days, for a total of two doses will be issued or administered to the individuals determined to be a risk. Individuals over the age of one year should take one adult dose (130mg) immediately when recommended and the next dose in 24 hours. Individuals under the age of one year should be given ½ an adult dose (65mg) immediately when recommended and the ½ and adult dose (65mg) in 24 hours. Doses will be issued by personnel of the Health Department at the Reception Center KI Distribution Point for the general public. KI for the Emergency Workers will be issued by the REP Coordinator or designee and self administered by the Emergency Worker.

Levy County: Plans are adequate. The Levy County REP Plan states potassium iodide can be given to emergency workers in doses to saturate the human thyroid gland with stable iodide and thus prevent the uptake of inhaled or ingested radioactive iodide. Potassium iodide does not protect other parts of the body to radiation exposure and does not protect the thyroid from external radiation. The greatest percentage of thyroid protection occurs when potassium iodide is administered at or about the time of exposure. Potassium iodide will be furnished for emergency workers and difficult to move people in accordance with established county procedures and policies and with the Department of Health, Standard Operating Procedures and Chapter 10 (Radiological Exposure Control) and Chapter 11 (Protective Response) of the State Annex.

Marion County: Plans are adequate. The Marion County REP Plan states potassium iodide can be given to emergency workers in doses to saturate the human thyroid gland with stable iodide and thus prevent the uptake of inhaled or ingested radioactive iodide. Potassium iodide does not protect other parts of the body to radiation exposure and does not protect the thyroid from external radiation. The greatest percentage of thyroid protection occurs when potassium iodide is administered at or about the time of exposure. Potassium iodide will be furnished for emergency workers and difficult to move people in accordance with established county procedures and policies and with the Department of Health, Standard Operating Procedures and Chapter 10 (Radiological Exposure Control) and Chapter 11 (Protective Response) of the State Annex.

Plan Reference

Florida

- State of Florida REMP, Chapter 10

Citrus County

- Radiological Emergency Preparedness Plan
- Florida REMP: Appendix VI

Levy County

- Radiological Emergency Preparedness Plan
- Florida REMP: Appendix VI

Marion County

- Radiological Emergency Preparedness Plan
- Florida REMP: Appendix VI

Criterion Evaluation:

State of Florida: **Adequate**
Citrus County: **Adequate**
Levy County: **Adequate**
Marion County: **Adequate**

- J.10.f Evaluation Criterion: State and local organizations plans should include the method by which decisions by the State Health Department for administering radioprotective drugs to the general population are made during an emergency and the pre-determined conditions under which such drugs may be used by offsite emergency workers;⁴

State of Florida: Plans are adequate. The Florida REMP, Chapter 10 and 11 states the Bureau of Radiation Control Operations Officer will authorize the use of potassium iodide for emergency workers, difficult to move populations, and the general public.

It further states the organization has determined potassium iodide will be furnished for emergency workers and difficult to move people in accordance with the Bureau of Radiation Control's standard operating procedures. Potassium iodide can be issued upon the recommendation of the Bureau of Radiation Control Operations Officer. Counties can then implement their own plans for dispensing potassium iodide. Workers should continue to take recommended doses of potassium iodide daily until risk of significant exposure to radioiodine by either inhalation or ingestion no longer exists. During an incident where the thyroid committed dose equivalent due to radioactive iodine is projected to be 5 rem or greater, actions to administer potassium iodide should be taken. The Bureau of Radiation Control Operations Officer will authorize the use of potassium iodide for emergency workers, difficult to move populations, and the general public.

The Florida REMP, Appendix VI states potassium iodide will be issued to members of the general public, in accordance with the Department of Health, Standard Operating Procedures and Chapter 10 (Radiological Exposure Control) and Chapter 11 (Protective Response) of the State Annex. To provide for issuance of potassium iodide to members of the public, doses have been procured. These doses are strategically located near nuclear power plant sites. During an emergency, if stocks at one or more locations run low, additional stocks from other sites will be brought in. The issuance of potassium iodide will be authorized by the Department of Health's Bureau of Radiation Control Operations Officer or designee.

Citrus County: Plans are adequate. The plan states potassium iodide will be issued to members of the general public, in accordance with the Department of Health, Standard Operating Procedures and Chapter 10 (Radiological Exposure Control) and Chapter 11 (Protective Response) of the State Annex. To provide for issuance of potassium iodide to

⁴ The Food and Drug Administration (FDA) issued a Potassium Iodide as a Thyroid Blocking Agent in a Radiological Emergency, on December 11, 2001 (66 FR238:64046). (This document supersedes a document with the same name that was issued by DHEW (now DHHS) in December 15, 1978, according to the Addenda to NUREG-0654/FEMA-REP-1 dated March 2002.)

members of the public, doses have been procured. These doses are strategically located near nuclear power plant sites. During an emergency, if stocks at one or more locations run low, additional stocks from other sites will be brought in. The issuance of potassium iodide will be authorized by the Department of Health's Bureau of Radiation Control Operations Officer or designee.

Levy County: Plans are adequate. The plan states potassium iodide will be issued to members of the general public, in accordance with the Department of Health, Standard Operating Procedures and Chapter 10 (Radiological Exposure Control) and Chapter 11 (Protective Response) of the State Annex. To provide for issuance of potassium iodide to members of the public, doses have been procured. These doses are strategically located near nuclear power plant sites. During an emergency, if stocks at one or more locations run low, additional stocks from other sites will be brought in. The issuance of potassium iodide will be authorized by the Department of Health's Bureau of Radiation Control Operations Officer or designee.

Marion County: Plans are adequate. The plan states potassium iodide will be issued to members of the general public, in accordance with the Department of Health, Standard Operating Procedures and Chapter 10 (Radiological Exposure Control) and Chapter 11 (Protective Response) of the State Annex. To provide for issuance of potassium iodide to members of the public, doses have been procured. These doses are strategically located near nuclear power plant sites. During an emergency, if stocks at one or more locations run low, additional stocks from other sites will be brought in. The issuance of potassium iodide will be authorized by the Department of Health's Bureau of Radiation Control Operations Officer or designee.

Plan Reference

Florida

- State of Florida REMP, Chapter 10, 11

Citrus County

- Radiological Emergency Preparedness Plan
- Florida REMP: Appendix VI

Levy County

- Radiological Emergency Preparedness Plan
- Florida REMP: Appendix VI

Marion County

- Radiological Emergency Preparedness Plan
- Florida REMP: Appendix VI

Criterion Evaluation:

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

J.10.g Evaluation Criterion: Means of relocation.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 11 states the evacuation of the general public normally will be initiated based on an analysis of the situation at the plant by BRC.

Maps showing evacuation routes, evacuation areas, pre-selected monitoring and sampling points, reception centers and shelters in designated host areas and population distribution around each facility are included in each respective site plan. Each site plan includes means for the notification, protection and relocation of all segments of the resident and transient population including mobility-impaired persons. Each site plan also includes evacuation time estimates. Each county will use the existing day-to-day means for dealing with potential impediments to evacuation and means for controlling access to evacuation areas.

Citrus County: Plans are adequate. Citrus County REP Plan states if the order to evacuate is given, evacuation may be required for all or part of the 10-mile Emergency Planning Zone designated by sector and utilizing geographic boundaries. Citizens residing in a sector/zone which is ordered to evacuate will be instructed to proceed according to the evacuation plan for that zone.

Levy County: Plans are adequate. Levy County REP Plan states if the order to evacuate is given, evacuation may be required for all or part of the 10-mile Emergency Planning Zone designated by sector and utilizing geographic boundaries. Citizens residing in a sector/zone which is ordered to evacuate will be instructed to proceed according to the evacuation plan for that zone. The population distribution by sector/zone within the 10-mile emergency planning zone is shown in Figure I-9.

Marion County: Plans are adequate. Levy County REP Plan states if the order to evacuate is given, evacuation may be required for all or part of the 10-mile Emergency Planning Zone designated by sector and utilizing geographic boundaries. Citizens residing in a sector/zone which is ordered to evacuate will be instructed to proceed according to the evacuation plan for that zone. The population distribution by sector/zone within the 10-mile emergency planning zone is shown in Figure I-9.

Plan Reference

Florida

- State of Florida REMP Chapter 11

Citrus County:

- Radiological Emergency Response Plan

Levy County:

- Radiological Emergency Response Plan

Marion County:

- Radiological Emergency Response Plan

Criterion Evaluation:

State of Florida: **Adequate**

Citrus County: **Adequate**

Levy County: **Adequate**

Marion County: **Adequate**

J.10.h. Evaluation Criterion: Relocation centers in host areas which are at least 5 miles, and preferably 10 miles, beyond the boundaries of the plume exposure emergency planning zone; (See J.12).

State of Florida: Plans are adequate. The REMP identifies relocation centers in host areas which are at least 5 miles, and preferably 10 miles, beyond the boundaries of the plume exposure emergency planning zone.

Citrus County: Plans are adequate. The Citrus County REP Plan states prior to the recommendation for evacuation, the Emergency Management Director or designee will order opening of the Reception Center at WTI. The Reception Center will register evacuees and provide them with temporary shelter, assistance and information, and provide a location for reunification with family members.

Levy County: Plans are adequate. The Levy County REP Plan states reception centers/registration centers will be established to provide food, medical and health care services, and temporary shelter to evacuees. The locations for these centers are shown in Figure I-7. After a previously agreed upon length of stay at a reception center, evacuees may be relocated to other shelter facilities.

Marion County: Plans are adequate. The Marion County REP Plan states reception centers/registration centers will be established to provide food, medical and health care services, and temporary shelter to evacuees. The locations for these centers are shown in Figure I-7. After a previously agreed upon length of stay at a reception center, evacuees may be relocated to other shelter facilities.

Plan Reference

Florida

- State of Florida REMP, Chapter 11

Citrus County

- Radiological Emergency Response Plan
- Florida REMP: Appendix VI

Levy County

- Radiological Emergency Response Plan
- Florida REMP: Appendix VI

Marion County

- Radiological Emergency Response Plan
- Florida REMP: Appendix VI

Criterion Evaluation:

State of Florida: **Adequate**
Citrus County: **Adequate**
Levy County: **Adequate**
Marion County: **Adequate**

J.10.i Evaluation Criterion: Projected traffic capacities of evacuation routes under emergency conditions.

State of Florida: Plans are adequate. The Florida REMP, Chapter 11 maps showing evacuation routes, evacuation areas, pre-selected monitoring and sampling point, reception centers and shelters I designated host areas and population distribution around each facility are included in each respective site plan. Each site plan includes means for the notification, protection and relocation of all segments of the resident and transient population including mobility-impaired persons. Each site plan also includes evacuation time estimates. Each county will use the existing day-to-day means for dealing with potential impediments to evacuation and means for controlling access to evacuation areas.

The Florida REMP, Appendix VI, Figure 20 provides the projected traffic capacities of evacuation routes under emergency conditions for LNP.

Citrus County: Plans are adequate. LNP specific plans and procedures were developed and contain information on the projected traffic capacities on evacuation routes under emergency conditions. The Florida REMP, Appendix VI, Figure 20 provides the projected traffic capacities of evacuation routes under emergency conditions for LNP.

Levy County: Plans are adequate. LNP specific plans and procedures were developed and contain information on the projected traffic capacities on evacuation routes under emergency conditions. The Florida REMP, Appendix VI, Figure 20 provides the projected traffic capacities of evacuation routes under emergency conditions for LNP.

Marion County: Plans are adequate. LNP specific plans and procedures were developed and contain information on the projected traffic capacities on evacuation routes under emergency conditions. The Florida REMP, Appendix VI, Figure 20 provides the projected traffic capacities of evacuation routes under emergency conditions for LNP.

Plan Reference

Florida

- State of Florida REMP:

- Chapter 11, Appendix VI Figure 20

Citrus County

- Radiological Emergency Response Plan
- Florida REMP: Appendix VI, Figure 20

Levy County

- Radiological Emergency Response Plan
- Florida REMP: Appendix VI, Figure 20

Marion County

- Radiological Emergency Response Plan
- Florida REMP: Appendix VI, Figure 20

Criterion Evaluation:

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- J.10.j. Evaluation Criterion: Control of access to evacuated areas and organization responsibilities for such controls.

State of Florida: Plans are adequate. The Florida REMP assigns the Florida Department of Law Enforcement to control access to evacuated areas and the organization with responsibilities for such controls. It selects the Department of Highway Safety and Motor Vehicles, Division of Highway Patrol to assist the Florida Department of Law Enforcement.

The Fish and Wildlife Conservation Commission has responsibility to conduct warning and evacuation of both deep and shallow waterways in and around nuclear power plants during radiological emergency operations. They must also assist State agencies as necessary.

The Florida Department of Environmental Protection, Division of Law Enforcement has responsibility to conduct warning and evacuation in state parks and recreation areas around nuclear power plants during radiological emergency operations. They must also assist State agencies as necessary.

Citrus County: Plans are adequate. As areas are evacuated, it will be necessary to provide for their security. This responsibility will be that of the Citrus County Sheriff's Office and State Highway Patrol as they are available and required. (Refer to REP SOP 22 "Citrus County Sheriff's Office"). LNP specific plans and procedures were developed to identify access control for evacuated areas and the organizations responsible for the tasks.

Levy County: Plans are adequate. The Levy County REP Plan states law enforcement officers from Marion County, assisted by Citrus County and Levy County law

enforcement officers and State Emergency Support Function 16 (Law Enforcement) will establish traffic control points along evacuation routes to expedite the flow of traffic during the evacuation process. Barricades will be utilized at those points not manned by law enforcement personnel. Entrances to the affected area will be blocked to all traffic except for school buses, ambulances, fire-rescue vehicles or other emergency vehicles being used in the evacuation.

Marion County: Plans are adequate. The Marion County REP Plan states law enforcement officers from Levy County, assisted by Citrus County and Marion County law enforcement officers and State Emergency Support Function 16 (Law Enforcement) will establish traffic control points along evacuation routes to expedite the flow of traffic during the evacuation process. Barricades will be utilized at those points not manned by law enforcement personnel. Entrances to the affected area will be blocked to all traffic except for school buses, ambulances, fire-rescue vehicles or other emergency vehicles being used in the evacuation.

Plan Reference

Florida

- State of Florida REMP: Chapter 2, Chapter 11

Citrus County:

- Radiological Emergency Response Plan
- Florida REMP: Appendix VI & Figure 5

Levy County

- Radiological Emergency Response Plan
- Florida REMP: Appendix VI & Figure 3

Marion County

- Radiological Emergency Response Plan
- Florida REMP: Appendix VI & Figure 7

Criterion Evaluation:

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

J.10.k. Evaluation Criterion: Identification of and means for dealing with potential impediments (e.g., seasonal impassability of roads) to use of evacuation routes, and contingency measures.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Appendix VI has maps showing evacuation routes, evacuation areas, pre-selected monitoring and sampling points, reception centers and shelters in designated host areas and population distribution

around each facility are included in each respective site plan. Each site plan includes means for the notification, protection and relocation of all segments of the resident and transient population including mobility-impaired persons. Each site plan also includes evacuation time estimates.

Citrus County: Plans are adequate. Citrus County will use the existing day-to-day means for dealing with potential impediments to evacuation and means for controlling access to evacuation areas.

Levy County: Plans are adequate. Levy County will use the existing day-to-day means for dealing with potential impediments to evacuation and means for controlling access to evacuation areas.

Marion County: Plans are adequate. Marion County will use the existing day-to-day means for dealing with potential impediments to evacuation and means for controlling access to evacuation areas.

Plan Reference

Florida

- State of Florida REMP, Chapter 11

Citrus County:

- Radiological Emergency Response Plan
- Florida REMP: Chapter 11

Levy County:

- Radiological Emergency Response Plan
- Florida REMP: Chapter 11

Marion County:

- Radiological Emergency Response Plan
- Florida REMP: Chapter 11

Criterion Evaluation:

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- J.10.1. Evaluation Criterion: Time estimates for evacuation of various sectors and distances based on a dynamic analysis (time-motion study under various conditions) for the plume exposure pathway emergency planning zone (See Appendix 4).

State of Florida: Plans are adequate. The Florida REMP, Appendix VI has maps showing evacuation routes, evacuation areas, pre-selected monitoring and sampling point, reception centers and shelters, designated host areas and population distribution around each facility are included in each respective site plan. Each site plan includes means for

the notification, protection and relocation of all segments of the resident and transient population including mobility-impaired persons. Each site plan also includes evacuation time estimates. Each county will use the existing day-to-day means for dealing with potential impediments to evacuation and means for controlling access to evacuation areas.

Citrus County: Plans are adequate. The Citrus County REP Plan states data is available from the Florida DOH which provides population estimates and evacuation times for each sector in the 10-Mile EPZ. (Refer to Figure 15 “10-Mile EPZ Sectors”, Figure 16 “10-Mile Traffic Capacity Data and Evacuation Time Estimates”, Figure 17 “Population Distribution By Sectors”, Figure 18A “Evacuation Routes” and Figure 18B “EPZ Population and Protective Action Maps Data”). This data will be used by the Chairperson of the Board of County Commissioners or designee and the Emergency Management Director or designee to determine the appropriate Protective Action Decision. (Refer to REP Sop 3 “Site Area Emergency” and REP SOP 4 “General Emergency”, also refer to Section III, Part 2.5 “Protective Response Actions” and Appendix 4 “PADs and Maps”).

Levy County: Plans are adequate. Levy County developed LNP specific plans and procedures that discuss evacuation time estimates and their use in protective action decision making.

Marion County: Plans are adequate. The Marion County Plan states out approximately 5 – 10 miles east/northeast of the Progress Energy Levy Site Complex as described by the following:

Northwestern, Northern, and eastern boundaries – The area of Rainbow Lakes Estates US Rt. 41

Southeastern Boundary – US Rt. 41 to include all areas of Dunnellon City Limits west of US Rt. 41

Western Boundary – Marion/Levy County line

Southern Boundary – Lake Rousseau

This Zone includes the following cities, neighborhoods, or areas:

- Rainbow Lakes Estates
- Rainbow’s End
- The area of Rainbow Springs west of Rt. 41
- The area of Dunnellon City Limits west of Rt. 41

Evacuees should proceed north on Rt. 41 to Williston.

Plan Reference

Florida

- State of Florida REMP:
- Chapter 11, Appendix VI, Figure 20

Citrus County:

- Radiological Emergency Response Plan
- Florida REMP: Appendix VI, Figure 20

Levy County:

- Radiological Emergency Response Plan
- Florida REMP: Appendix VI, Figure 20

Marion County:

- Radiological Emergency Response Plan
- Florida REMP: Appendix VI, Figure 20

Criterion Evaluation:

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

J.10.m. Evaluation Criterion: The bases for the choice of recommended protective actions for the plume exposure pathway during emergency conditions. This shall include expected local protection afforded in residential units or other shelter for direct and inhalation exposure, as well as evacuation time estimates.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 11 states the State of Florida Comprehensive Emergency Management Plan outlines state agencies that have a lead or support role during a declared emergency. These roles are shared by many state agencies: The Department of Health is the lead State agency for exposure pathway responses and the Division of Emergency Management is responsible for overall state coordination of non-technical radiological resources under this Annex. Other State agencies may also be involved in implementing protective actions to reduce the public's risk of exposure.

Citrus County: Not Applicable

Levy County: Not Applicable

Marion County: Not Applicable

Plan Reference

Florida

- State of Florida REMP Chapter 11

Criterion Evaluation:

| | |
|-------------------|-----------------------|
| State of Florida: | Adequate |
| Citrus County: | Not Applicable |

Levy County: **Not Applicable**
Marion County: **Not Applicable**

- J.11 Evaluation Criterion: Each State shall specify the protective measures to be used for the ingestion pathway, including the methods for protecting the public from consumption of contaminated foodstuffs. This shall include criteria for deciding whether dairy animals should be put on stored feed. The plan shall identify procedures for detecting contamination, for estimating the dose commitment consequences of uncontrolled ingestion, and for imposing protection procedures such as impoundment, decontamination, processing, decay, product diversion, and preservation. Maps for recording surveys and monitoring data, key land use data (e.g., farming), dairies, food processing plants, water sheds, water supply intake and treatment plants and reservoirs shall be maintained. Provisions for maps showing detailed crop information may be by including reference to their availability and location and a plan for their use. The maps shall start at the facility and include the entire 50-mile ingestion pathway EPZ. Up-to-date lists of the name and location of all facilities which regularly process milk products and other large amounts of food or agricultural products originating in the ingestion pathway Emergency Planning Zone, but located elsewhere, shall be maintained.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 11 states the primary risk for the ingestion pathway is from the ingestion of contaminated water or foods. The Bureau of Radiation Control has adopted protective action guides that are consistent with federal guidance provided by the Food and Drug Administration. Lists and maps for monitoring and assessment data, land use data, dairies, food processing plants, water sheds, water supply intake and treatment plants and reservoirs will be provided to the risk and ingestion counties. The Division of Emergency Management will coordinate with the appropriate state and local agencies to ensure that the Division has the best data available.

Citrus County: Not Applicable
Levy County: Not Applicable
Marion County: Not Applicable

Plan Reference

Florida
State of Florida REMP Chapter 11

Criterion Evaluation:

State of Florida: **Adequate**
Citrus County: **Not Applicable**
Levy County: **Not Applicable**
Marion County: **Not Applicable**

- J.12 Evaluation Criterion: Each organization shall describe the means for registering and monitoring of evacuees at relocation centers in host areas. The personnel and equipment available should be capable of monitoring within about a 12 hour period all residents and transients in the plume exposure EPZ arriving at relocation centers.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 11 states citizen decontamination, registration, and evacuee monitoring points shall be established in the affected counties in accordance with procedures spelled out in the site plans (Appendices I-IV of this Annex), Federal agencies may provide assistance as outlined in the National Response Framework Nuclear/Radiological Incident Annex.

Citrus County: Plans are adequate. The Citrus County REP Plan states The County Health Department is responsible for setting up the Reception Center located at WTI, support decontamination operations, health and disease prevention measures, personal hygiene, and coordinating procurement of medical service support at the Reception Center/Shelter(s). (Refer to Section III, Part 2.5 “Reception Center, Radiological Personnel Monitoring Station and Wash Down Stations”, and Refer to Section III, Part 2.9.7.6 “Reception Center, Personnel Monitoring Centers and Vehicle Wash Down Station - Responsibility of set-up”). (Also Refer to REP SOP 16 “Citrus County Health Department”)

Levy County: Plans are adequate. The Levy County REP Plan states registration of evacuees will be conducted at all reception centers/shelters in Levy County. Registration personnel will use shelter registration forms in accordance with established county procedures. Registration data will be tabulated and submitted to the County Emergency Operations Centers and the State Emergency Operations Center.

Reception centers/registration centers will be established to provide food, medical and health care services, and temporary shelter to evacuees. The locations for these centers are shown in Figure I-7. After a previously agreed upon length of stay at a reception center, evacuees may be relocated to other shelter facilities.

Marion County: Plans are adequate. The Marion County REP Plan states registration of evacuees will be conducted at all reception centers/shelters in Marion County. Registration personnel will use shelter registration forms in accordance with established county procedures. Registration data will be tabulated and submitted to the County Emergency Operations Centers and the State Emergency Operations Center.

Reception centers/registration centers will be established to provide food, medical and health care services, and temporary shelter to evacuees. The locations for these centers are shown in Figure I-7. After a previously agreed upon length of stay at a reception center, evacuees may be relocated to other shelter facilities.

Plans identify actions specific to an incident at LNP.

Plan Reference

Florida

- State of Florida REMP Chapter 11

Citrus County:

- Radiological Emergency Response Plan
- Florida REMP: Appendix VI

Levy County:

- Radiological Emergency Response Plan
- Florida REMP: Appendix VI

Marion County:

- Radiological Emergency Response Plan
- Florida REMP: Appendix VI

Criterion Evaluation:

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- K. Radiological Exposure Control** Planning Standard: Means for controlling radiological exposures, in an emergency, are established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides.

- K.3.a. Evaluation Criterion: Each organization shall make provision for 24-hour-per-day capability to determine the doses received by emergency personnel involved in any nuclear accident, including volunteers. Each organization shall make provisions for distribution of dosimeters, both self-reading and permanent record devices.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 10 provides for emergency worker dosimetry and dose determination.

Citrus County: Plans are Adequate. The Citrus County REP Plan states dosimetry Kits and radiation instruments will be assigned to Fire Rescue/Special Operations team assigned to staff the Wash Down and Personnel Monitoring Stations. The emergency workers will verify the dosimeters are set to zero and fill out the included dose cards. The emergency workers will also perform a pre-operational check on their assigned instruments and determine the background readings prior to use.

Levy County: Plans are Adequate. The Levy County REP Plan emergency workers will be issued direct-read and permanent record dosimeter-badges prior to entering any area suspected of radioactive contamination, and given instructions on assembly, wear position and record keeping, in accordance with procedures outlined in Chapter 11

(Protective Response) of the State Annex and with established county procedures. Personnel performing emergency service functions inside the radiation hazard area will read direct-read dosimeters at 30-minute intervals and report accumulated exposure to their supervisor every six hours and when readings reach 100mR and 500mR as outlined in Chapter 10 (Radiological Exposure Control) of the State Annex. The supervisor will be responsible for maintaining dose records that will be reported to the Levy County Emergency Operations Center at least every 6 hours. It will be the joint responsibility of the emergency worker and his supervisor to assess the projected dose and interpret or extrapolate the individual's potential or projected exposure.

Marion County: Plans are Adequate. The Marion County REP Plan emergency workers will be issued direct-read and permanent record dosimeter-badges prior to entering any area suspected of radioactive contamination, and given instructions on assembly, wear position and record keeping, in accordance with procedures outlined in Chapter 11 (Protective Response) of the State Annex and with established county procedures. Personnel performing emergency service functions inside the radiation hazard area will read direct-read dosimeters at 30-minute intervals and report accumulated exposure to their supervisor every six hours and when readings reach 100mR and 500mR as outlined in Chapter 10 (Radiological Exposure Control) of the State Annex. The supervisor will be responsible for maintaining dose records that will be reported to the Marion County Emergency Operations Center at least every 6 hours. It will be the joint responsibility of the emergency worker and his supervisor to assess the projected dose and interpret or extrapolate the individual's potential or projected exposure.

Plan Reference

State of Florida

- Florida REMP, Chapter 10
- Florida REMP, Appendix VI, Section XI

Citrus County

- Citrus County REP Plan

Levy County

- Radiological Emergency Response Plan

Marion County

- Radiological Emergency Response Plan

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- K.3.b. Evaluation Criterion: Each organization shall ensure that dosimeters are read at appropriate frequencies and provide for maintaining dose records for emergency workers involved in any nuclear accident.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 10 provides for emergency worker dose recording.

Citrus County: Plans are Adequate. The Citrus County REP Plan states emergency workers working in the 10-mile EPZ should be assigned Dosimetry which keeps track of the workers accumulated radiation exposure. While the emergency workers are in the 10-mile EPZ, they are required to look at their dosimeters every 30 minutes. The emergency workers should report the following situations described below to the Exposure Control Person. The Exposure Control Person is then required to relay the information to the REP Coordinator or designee in the Sheriff's Office EOC.

Emergency workers will be issued direct-reading dosimeters and permanent record Dosimeter Badges (TLD) prior to entering any area suspected of radioactive contamination, and given instructions on assembly, body placement location and record keeping in accordance with their associated established REP SOPs. Personnel performing emergency service functions inside the Radiation Controlled Area will read their direct-reading dosimeters at 30-minute intervals and report accumulated exposure to their supervisor every six hours. The Exposure Control Person will be responsible for maintaining dose records that will be reported to the REP Coordinator at the Sheriff's Office EOC at least every 6 hours. It will be the joint responsibility of the emergency worker and his supervisor or Exposure Control Person to assess the projected dose and interpret or extrapolate the individual's potential or projected exposure.

Levy County: Plans are Adequate. The Levy County REP Plan states emergency workers will be issued direct-read and permanent record dosimeter-badges prior to entering any area suspected of radioactive contamination, and given instructions on assembly, wear position and record keeping, in accordance with procedures outlined in Chapter 11 (Protective Response) of the State Annex and with established county procedures. Personnel performing emergency service functions inside the radiation hazard area will read direct-read dosimeters at 30-minute intervals and report accumulated exposure to their supervisor every six hours and when readings reach 100mR and 500mR as outlined in Chapter 10 (Radiological Exposure Control) of the State Annex. The supervisor will be responsible for maintaining dose records that will be reported to the Levy County Emergency Operations Center at least every 6 hours. It will be the joint responsibility of the emergency worker and his supervisor to assess the projected dose and interpret or extrapolate the individual's potential or projected exposure.

Marion County: Plans are adequate. The Marion County REP Plan states emergency workers will be issued direct-read and permanent record dosimeter-badges prior to

entering any area suspected of radioactive contamination, and given instructions on assembly, wear position and record keeping, in accordance with procedures outlined in Chapter 11 (Protective Response) of the State Annex and with established county procedures. Personnel performing emergency service functions inside the radiation hazard area will read direct-read dosimeters at 30-minute intervals and report accumulated exposure to their supervisor every six hours and when readings reach 100mR and 500mR as outlined in Chapter 10 (Radiological Exposure Control) of the State Annex. The supervisor will be responsible for maintaining dose records that will be reported to the Marion County Emergency Operations Center at least every 6 hours. It will be the joint responsibility of the emergency worker and his supervisor to assess the projected dose and interpret or extrapolate the individual's potential or projected exposure.

Plan Reference

State of Florida

- Florida REMP, Chapter 10
- Florida REMP, Appendix VI, Section XI

Citrus County

- Radiological Emergency Response Plan

Levy County

- Radiological Emergency Response Plan

Marion County

- Radiological Emergency Response Plan

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- K.4. Evaluation Criterion: Each State and local organization shall establish the decision chain for authorizing emergency workers to incur exposures in excess of the EPA General Public Protective Action Guides (i.e., EPA PAGs for emergency workers and lifesaving activities).

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 10, Section III states that the State Coordinating Officer or designee may, after consultation with the Bureau of Radiation Control Operations Officer, authorize exposure in excess of 500 mR for State Emergency Response Team personnel.

Citrus County: Plans are adequate. The Citrus County REP Plan states should it become necessary to expose emergency workers to radiation doses in excess of EPA Protective

Action Guides (>500mR), (refer to Figure 3A “Early Phase EPA PAGs”), the Chairperson of the Board of County Commissioners or designee, will make the decision to allow the exposure or not after consultation with the Florida DOH, Emergency Management Director or designee and County Health Department. Should the Chairperson be absent, the next Commissioner in line will make the decision. (Refer to Section III, Part 2.9.1 “Protection Action Guidelines”

Levy County: Plans are adequate. The Levy County REP plan states should it become necessary to expose emergency workers to radiation doses in excess of Environmental Protection Agency Protective Action Guides, the Chairperson, Levy County Board of County Commissioners, will make the decision after consultation with the Department of Health, Operations Director and County Health Department. Should the Chairperson be absent, the next Commissioner in line will make the decision.

Marion County: Plans are adequate. The Marion County REP plan states should it become necessary to expose emergency workers to radiation doses in excess of Environmental Protection Agency Protective Action Guides, the Chairperson, Marion County Board of County Commissioners, will make the decision after consultation with the Department of Health, Operations Director and County Health Department. Should the Chairperson be absent, the next Commissioner in line will make the decision.

Plan Reference

State of Florida

- Florida REMP, Chapter 10, Section III
- Florida REMP, Appendix VI, Sections II.A.1, II.B.1, II.C.1, and XI

Citrus County

- Radiological Emergency Preparedness Plan

Levy County Plan references:

- Radiological Emergency Preparedness Plan

Marion County Plan references:

- Radiological Emergency Preparedness Plan

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- K.5.a Evaluation Criterion: Each organization as appropriate, shall specify action levels for determining the need for decontamination.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 10, Section V and Figure 10-2 provide action levels for determining the need for decontamination.

Citrus County: Plans are Adequate. The Citrus County REP Plan states Monitoring stations and wash down sites will be set up in predetermined locations to inspect the evacuation traffic for radioactive contamination and to decontaminate vehicles. Emergency traffic control personnel will divert traffic when necessary to ensure the inspection of vehicles in the event that all stations cannot be utilized.

Monitoring will be performed by trained personnel utilizing CD V-777-1 (or equivalent) emergency response kits in accordance with established county procedures. The limits of contamination that determine the need for decontamination of personnel and vehicles are listed in Chapter 10, Figure 10-2 (Radiological Exposure Control) of the State Annex.

Uncontaminated passengers in uncontaminated vehicles will be instructed to proceed to designated reception centers and shelters.

Levy County: Plans are Adequate. The Levy County REP Plan states monitoring stations and wash down sites will be set up in predetermined locations to inspect the evacuation traffic for radioactive contamination and to decontaminate vehicles. Emergency traffic control personnel will divert traffic when necessary to ensure the inspection of vehicles in the event that all stations cannot be utilized.

Monitoring will be performed by trained personnel utilizing CD V-777-1 (or equivalent) emergency response kits in accordance with established county procedures. The limits of contamination that determine the need for decontamination of personnel and vehicles are listed in Chapter 10, Figure 10-2 (Radiological Exposure Control) of the State Annex.

Uncontaminated passengers in uncontaminated vehicles will be instructed to proceed to designated reception centers and shelters.

Marion County: Plans are adequate. The Marion County REP Plan states monitoring stations and wash down sites will be set up in predetermined locations to inspect the evacuation traffic for radioactive contamination and to decontaminate vehicles. Emergency traffic control personnel will divert traffic when necessary to ensure the inspection of vehicles in the event that all stations cannot be utilized.

Monitoring will be performed by trained personnel utilizing CD V-777-1 (or equivalent) emergency response kits in accordance with established procedures. The limits of contamination that determine the need for decontamination of personnel and vehicles are listed in Chapter 10, Figure 10-2 (Radiological Exposure Control) of the State Annex.

Uncontaminated passengers in uncontaminated vehicles will be instructed to proceed to designated reception centers and shelters.

Plan Reference

State of Florida

- Florida REMP, Chapter 10, Section V and Figure 10-2
- Florida REMP, Appendix VI, Sections XII.H

Citrus County

- Radiological Emergency Response Plan

Levy County Plan references:

- Radiological Emergency Response Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

State of Florida: **Adequate**

Citrus County: **Adequate.**

Levy County: **Adequate.**

Marion County: **Adequate**

- K.5.b Evaluation Criterion: Each organization, as appropriate, shall establish the means for radiological decontamination of emergency personnel wounds, supplies, instruments and equipment, and for waste disposal.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 10, Section V describes the means for decontamination and waste disposal.

Citrus County: Plans are Adequate. The Citrus County REP Plan states Evacuees and Emergency Responders that are monitored at Personnel Monitoring Stations and Wash down Stations who are suspected of being contaminated will be decontaminated at that location. Radiation monitoring personnel will thoroughly check the evacuees for radiation levels in excess of the established limits. Contaminated evacuees will shower and exchange contaminated clothing for uncontaminated clothing.

The names, addresses and contamination information of evacuees requiring decontamination should be recorded on the “Personnel Contamination Form”, and submitted to the Citrus County Health Department. (See Figure 24). They will forward the data to the REP Coordinator or designee at the Sheriff’s Office EOC and the Florida Department of Health. Evacuees and Emergency Personnel that cannot be decontaminated to acceptable levels will be transported to Citrus Memorial Health System by EMS. (Refer to REP Sop 27 “Personnel and Vehicle Monitoring”
2.9.10.3 Radioactive Waste Disposal.

All tools and equipment will be monitored for Radioactive Contamination. Any contaminated tools, clothing, equipment and other material that are found to be contaminated will be placed in plastic bags, tagged, placed in suitable containers for later disposition, under the direction of the County Health Department and the Florida

Department of Health. Coordination with Progress Energy will be made to retrieve all Radioactive Contaminated Waste.

Water used for tool and vehicle decontamination will be allowed to run into suitable collection ditches, holding ponds, and other secure areas. These collection areas used for decontamination will be monitored for residual contamination. Any site found to retain Radioactive Contamination will be appropriately posted as a "Contaminated Area" and be under the control of the Emergency Management Director or designee, Citrus County Health Department, Fire Rescue/Special Operations and secured by the Sheriff's Office and State Law Enforcement agencies. The Areas will be decontaminated with the assistance from the Florida DOH personnel and other appropriate federal and state agencies.

Levy County: Plans are Adequate. The Levy County REP Plan states evacuees inspected at monitoring and wash down stations in Marion County who are suspected of being contaminated will be decontaminated at that location. A personnel decontamination station will be set up adjacent to the monitoring and wash down stations. Monitors will thoroughly check the evacuees for radiation levels in excess of the established limits. Contaminated evacuees will shower and exchange contaminated clothing for uncontaminated clothing.

The names, addresses and contamination information of evacuees requiring decontamination will be recorded and submitted to the Marion County Health Department, which will forward the data to the Radiological Safety Officer and the Florida Department of Health.

Tools and equipment will be monitored and all contaminated tools, clothing, equipment and other material found to be contaminated will be placed in plastic bags, tagged, and placed in suitable containers for later disposition, under the direction of the County Health Department and the Florida Department of Health.

Water used for tool and vehicle decontamination will be allowed to run into suitable collection ditches, holding ponds, and other secure areas. Areas used for decontamination will be monitored for residual contamination. Any site found to retain contamination will be sealed off under the control of the County Health and law enforcement agencies and decontaminated with the assistance of the Department of Health personnel and other appropriate federal and state agencies.

Marion County: Plans are adequate. The Marion County REP Plan states evacuees inspected at monitoring and wash down stations in Marion County who are suspected of being contaminated will be decontaminated at that location. A personnel decontamination station will be set up adjacent to the monitoring and wash down stations. Monitors will thoroughly check the evacuees for radiation levels in excess of the established limits. Contaminated evacuees will shower and exchange contaminated clothing for uncontaminated clothing.

The names, addresses and contamination information of evacuees requiring decontamination will be recorded and submitted to the Marion County Health Department, which will forward the data to the Radiological Safety Officer and the Florida Department of Health.

Tools and equipment will be monitored and all contaminated tools, clothing, equipment and other material found to be contaminated will be placed in plastic bags, tagged, and placed in suitable containers for later disposition, under the direction of the County Health Department and the Florida Department of Health.

Water used for tool and vehicle decontamination will be allowed to run into suitable collection ditches, holding ponds, and other secure areas. Areas used for decontamination will be monitored for residual contamination. Any site found to retain contamination will be sealed off under the control of the County Health and law enforcement agencies and decontaminated with the assistance of the Department of Health personnel and other appropriate federal and state agencies.

Plan Reference

State of Florida

- Florida REMP, Chapter 10, Section V
- Florida REMP, Appendix VI, Section XII.H

Citrus County

- Radiological Emergency Preparedness Plan

Levy County Plan references:

- Radiological Emergency Preparedness Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

State of Florida: **Adequate**

Citrus County: **Adequate**

Levy County: **Adequate**

Marion County: **Adequate**

L. Medical and Public Health Support

Planning Standard: Arrangements are made for medical services for contaminated injured individuals.⁵

⁵ The availability of an integrated emergency medical services system and a public health emergency plan serving the area in which the facility is located and, as a minimum, equivalent to the Public Health Service Guide for Developing Health Disaster Plans, 1974, and to the requirements of an emergency medical services system as outlined in the Emergency Medical Services System Act of 1973 (PL 93-154 and amendments in the 1979 PL 96-142), should be a part of and consistent with overall State or local disaster control plans and should be compatible with the specific overall emergency response for the facility.

- L.1. Evaluation Criterion: Each organization shall arrange for local and backup hospital and medical services having the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 12, and Florida REMP, Appendix VI, Section XIII describes the arrangements which have been made with area hospitals capable of providing the required services.

Citrus County: Plans are Adequate. The Citrus County REP Plan states Citrus Memorial Health System and Seven Rivers Regional Medical Center are the local hospitals where medical services for radiological injuries can be received. Both hospitals are equipped and staffed to care for individuals with major radiation contamination. Both hospitals have developed and written their own individual procedures pertaining to the care of radiologically injured patients.

The Florida Department of Health and Progress Energy has obtained a “Letter of Agreement” with both, Citrus Memorial Health System and Seven Rivers Regional Medical Center to ensure proper medical services for persons who are injured or become sick during a radiological emergency in the Crystal River Nuclear Plant. (See Figure 25A “Letter of Agreement-Citrus Memorial Health System” and Figure 25B “Letter of Agreement-Seven Rivers Regional Medical Center”). The Florida Department of Health and Progress Energy have also obtained a “Letter of Agreement” with Nature Coast Emergency Medical Services to provide ambulance services. (See Figure 25C “Letter of Agreement-Nature Coast EMS”).

Levy County: Plans are Adequate. The Levy County REP Plan states Citrus Memorial Hospital Systems and Seven Rivers Regional Medical Center are the local hospitals where medical services for radiological injuries can be received. Both Hospitals are equipped and staffed to care for individuals with major radiation contamination.

The Department of Health has obtained agreements with Citrus Memorial Hospital Systems and Seven Rivers Regional Medical Center to ensure proper medical services for persons who are injured or become sick during a radiological emergency in the Levy Nuclear Plant site area. Nature Coast Emergency Medical Services will provide ambulance services.

The Nature Coast Regional Hospital and Levy County Health Department will provide general health care for evacuees. Medical response personnel will be dispatched to hosting facilities as needed. Refer to Chapter 12 (Medical and Public Health Support) of the State Annex for additional information.

Marion County: Plans are adequate. The Marion County REP Plan states Citrus Memorial Hospital Systems and Seven Rivers Regional Medical Center are the local hospitals where medical services for radiological injuries can be received. Both

Hospitals are equipped and staffed to care for individuals with major radiation contamination.

The Department of Health has obtained agreements with Citrus Memorial Hospital Systems and Seven Rivers Regional Medical Center to ensure proper medical services for persons who are injured or become sick during a radiological emergency in the Levy Nuclear Plant site area. Nature Coast Emergency Medical Services will provide ambulance services.

The Nature Coast Regional Hospital and Levy County Health Department will provide general health care for evacuees. Medical response personnel will be dispatched to hosting facilities as needed. Refer to Chapter 12 (Medical and Public Health Support) of the State Annex for additional information.

Plan Reference

State of Florida

- Florida REMP, Chapter 12
- Florida REMP, Appendix VI, Section XIII

Citrus County

- Radiological Emergency Response Plan

Levy County Plan references:

- Radiological Emergency Response Plan

Marion County Plan references:

- Radiological Emergency Response Plan

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- L.3. Evaluation Criterion: Each State shall develop lists indicating the locations of public, private and military hospitals and other emergency medical service facilities within the State or contiguous States considered capable of providing medical support for any contaminated injured individual. The listing shall include the name, location, type of facility and capacity, and any special radiological capabilities. These emergency medical services should be able to radiologically monitor contamination personnel, and have facilities and trained personnel able to care for contaminated injured persons.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 12, Figure 12-1 lists the facilities within the state capable of providing the required services. Florida REMP, Appendix VI, Section XIII identifies the hospitals near LNP which will be used.

Citrus County: Not Applicable
Levy County: Not Applicable
Marion County: Not Applicable

Plan Reference

State of Florida

- Florida REMP, Chapter 12
- Florida REMP, Appendix VI, Section XIII

Criterion Evaluation

| | |
|-------------------|-----------------------|
| State of Florida: | Adequate |
| Citrus County: | Not Applicable |
| Levy County: | Not Applicable |
| Marion County: | Not Applicable |

- L.4. Evaluation Criterion: Each organization shall arrange for transporting victims of radiological accidents to medical support facilities.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 12 describes arrangements made with ambulance services to provide transportation for victims of radiological accidents. Figure 12-2 lists the specific ambulance services.

Citrus County: Plans are Adequate. The Citrus County REP Plan states a radiological emergency at the Crystal River Nuclear Plant can present actual or potential radiological health hazards to individuals within the radiologically effected areas. It is imperative that capabilities exist for treating contaminated or acutely irradiated individuals. In on going capability for emergency care and transportation of victims of accidents and sudden illness and special needs populations during evacuation must also exist.

Coordination of the delivery of medical and health services for victims of radiological emergencies is the responsibility of the Citrus County Emergency Management Director or designee and Florida Department of Health as the lead agency. The Florida Department of Health Emergency Coordinating Officer is designated by the Governor or Secretary of State or designee for the response and recovery efforts associated with a disaster. The Florida Department of Health will coordinate with Citrus Memorial Health System, Seven Rivers Regional Medical Center and EMS in Citrus County. Communications between the hospitals and EMS will be performed via local EMS medical services communication systems.

Levy County: Plans are Adequate. The Levy County REP Plan states Citrus Memorial Hospital Systems and Seven Rivers Regional Medical Center are the local hospitals

where medical services for radiological injuries can be received. Both Hospitals are equipped and staffed to care for individuals with major radiation contamination.

The Department of Health has obtained agreements with Citrus Memorial Hospital Systems and Seven Rivers Regional Medical Center to ensure proper medical services for persons who are injured or become sick during a radiological emergency in the Levy Nuclear Plant site area. Nature Coast Emergency Medical Services will provide ambulance services.

The Nature Coast Regional Hospital and Levy/Marion County Health Department will provide general health care for evacuees. Medical response personnel will be dispatched to hosting facilities as needed. Refer to Chapter 12 (Medical and Public Health Support) of the State Annex for additional information.

Marion County: Plans are adequate. Citrus Memorial Hospital Systems and Seven Rivers Regional Medical Center are the local hospitals where medical services for radiological injuries can be received. Both Hospitals are equipped and staffed to care for individuals with major radiation contamination.

The Department of Health has obtained agreements with Citrus Memorial Hospital Systems and Seven Rivers Regional Medical Center to ensure proper medical services for persons who are injured or become sick during a radiological emergency in the Levy Nuclear Plant site area. Nature Coast Emergency Medical Services will provide ambulance services.

The Nature Coast Regional Hospital and Levy County Health Department will provide general health care for evacuees. Medical response personnel will be dispatched to hosting facilities as needed. Refer to Chapter 12 (Medical and Public Health Support) of the State Annex for additional information.

Plan Reference

State of Florida

Florida REMP, Chapter 12

Citrus County

Radiological Emergency Preparedness Plan

Levy County Plan references:

Radiological Emergency Preparedness Plan

Marion County Plan references:

Radiological Emergency Response Plan

Criterion Evaluation

State of Florida: **Adequate**

Citrus County: **Adequate**

Levy County: **Adequate**

Marion County: **Adequate**

M. Recovery and Reentry Planning and Post-accident Operations Planning Standard:
General plans for recovery and reentry are developed.

- M.1. Evaluation Criterion: Each organization, as appropriate, shall develop general plans and procedures for reentry and recovery and describe the means by which decisions to relax protective measures (e.g., allow reentry into an evacuated area) are reached. This process should consider both existing and potential conditions.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 13 establishes guidelines for recovery and reentry decision making and operations and provides a sample recovery and return plan.

Citrus County: Plans are Adequate. The Citrus County REP Plan addresses reentry and recovery operations and the decision making process for relaxing protective measures.

Levy County: Plans are Adequate. The Levy County REP Plan states Decisions to relax protective actions and begin recovery operations will be made jointly by the state and county in accordance with procedures outlined in Chapter 13 (Recovery and Return) of the State Annex. Evacuees will be allowed to reenter the affected area under the direction of the County Emergency Operations/Management Director, or their designee.

Marion County: Plans are adequate. The Marion County REP Plan states Decisions to relax protective actions and begin recovery operations will be made jointly by the state and county in accordance with procedures outlined in Chapter 13 (Recovery and Return) of the State Annex. Evacuees will be allowed to reenter the affected area under the direction of the County Emergency Operations/Management Director, or their designee.

Plan Reference

State of Florida

Florida REMP, Chapter 13

Florida REMP, Appendix VI, Section XIII

Citrus County

Radiological Emergency Response Plan

Levy County Plan references:

Radiological Emergency Response Plan

Marion County Plan references:

Radiological Emergency Response Plan

Criterion Evaluation

State of Florida: **Adequate**

Citrus County: **Adequate**
Levy County: **Adequate**
Marion County: **Adequate**

- M.3. Evaluation Criterion: Each licensee and State plan shall specify means for informing members of the response organizations that a recovery operation is to be initiated, and of any changes in the organizational structure that may occur.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 13 states that recovery operations will be coordinated and directed from the licensee's emergency operations facility by the State Coordinating Officer (SCO) or designee. The SCO will coordinate with the counties and appropriate agencies.

Citrus County: Not Applicable
Levy County: Not Applicable
Marion County: Not Applicable

Plan Reference

State of Florida
Florida REMP, Chapter 13

Criterion Evaluation

State of Florida: **Adequate**
Citrus County: **Not Applicable**
Levy County: **Not Applicable**
Marion County: **Not Applicable**

- M.4. Evaluation Criterion: Each plan shall establish a method for periodically estimating total population exposure.

Criterion Statement

State of Florida: Plans are adequate. The Florida REMP, Chapter 13 states that estimates of population exposure will be made following return based on methods developed in the United States Environmental Protection Agency's Manual of Protective Action Guides and Protective Actions for Nuclear Power Plants (EPA 400-R-92-001, May 1992).

Citrus County: Not Applicable
Levy County: Not Applicable
Marion County: Not Applicable

Plan Reference

State of Florida

- Florida REMP, Chapter 13

Criterion Evaluation

| | |
|-------------------|-----------------------|
| State of Florida: | Adequate |
| Citrus County: | Not Applicable |
| Levy County: | Not Applicable |
| Marion County: | Not Applicable |

N. Exercises and Drills

Planning Standard: Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.

Qualifying exercise scheduled for 2017.

- N.1.a. Evaluation Criterion: An exercise is an event that tests the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organizations. The emergency preparedness exercise shall simulate an emergency that results in offsite radiological releases which would require response by offsite authorities. Exercises shall be conducted as set forth in NRC and FEMA rules.

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 14, Section II, and Florida REMP, Appendix VI, Section XV provide for conducting emergency preparedness exercises as set forth in NRC and FEMA rules.

Chapter 14 of the State Annex states a full participation exercise is a joint exercise designed to fully demonstrate the emergency preparedness and response capabilities of the state and respective county governments. This exercise will include mobilization of state and county response organizations identified in this plan, and will be conducted jointly with the licensee's required exercise. The site for this exercise will alternate so that it will be conducted at a different facility every two years.

Citrus County: Plans are Adequate. The Citrus County REP Plan states it will coordinate required exercises simulating offsite response to a radiological release for the Citrus County Emergency Response Agencies in conjunction with Progress Energy, Florida Division of Emergency Management and Levy County. Exercises and drills must be conducted periodically to evaluate the adequacy of the State Radiological Emergency Management Plan (Annex A), Citrus County Radiological Emergency Preparedness (REP) Plan and SOPs, and the skills of county response organizations and agencies.

Levy County: Plans are Adequate. The Levy County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Marion County: Plans are adequate. The Marion County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Plan Reference

State of Florida

- Florida REMP, Chapter 14, Section II
- Florida REMP, Appendix VI, Section XV

Citrus County

- Radiological Emergency Response Plan

Levy County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section II

Marion County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section II

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

N.1.b. Evaluation Criterion: An exercise shall include mobilization of State and local personnel and resources adequate to verify the capability to respond to an accident scenario requiring response. The organization shall provide for a critique of the biennial exercise by Federal and State observers/evaluators.⁶ The scenario should be varied from exercise to exercise such that the major elements of the plans and preparedness organizations are tested within a six-year period. Each organization should make provisions to start an exercise between 6: 00 p. m. and 4: 00 a. m. within a six-year period for exercising under various weather conditions. At least one exercise over a period of six years should be unannounced.

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 14, Section II, and Florida REMP, Appendix VI, Section XV provide for the participation in and critique of

⁶ Changes have been made to this criterion as specified by GM PR-1.

emergency preparedness exercises with varied scenarios so that all major elements of the plan, and preparedness organizations, are tested within a six-year period.

Chapter 14 of the State Annex states Florida is required to participate in a joint exercise at some site on a rotational basis at least every two years. When not fully participating in an exercise at a site, the state will partially participate at that site to support the full participation of appropriate local governments. Scenarios will be varied from year to year so all major elements of the plan, and preparedness organizations, are tested within a six-year period.

Citrus County: Plans are Adequate. The Citrus County REP Plan states an exercise is an event that tests the integrated capability and a major portion of the basic elements existing within the REP plan and organizations. An emergency-response exercise will be conducted at least annually. FEMA observed exercises will be conducted on a biennial basis. Each exercise should test the current overall emergency response capabilities of the Crystal River Nuclear Plant, the Citrus County Emergency Management Division and the emergency response capabilities of the State of Florida and Levy County to respond to an emergency at the Crystal River Nuclear Plant that results in offsite radiological releases.

The exercise scenario should be varied from year to year so that all major elements of the REP Plan and all preparedness organizations are tested within a **six-year period**.

Levy County: Plans are Adequate. The Levy County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Marion County: Plans are adequate. The Marion County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Plan Reference

State of Florida

- Florida REMP, Chapter 14, Section II
- Florida REMP, Appendix VI, Section XV

Citrus County

- Radiological Emergency Response Plan

Levy County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section II

Marion County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section II

Criterion Evaluation

State of Florida: **Adequate**
Citrus County: **Adequate**
Levy County: **Adequate**
Marion County: **Adequate**

N.2. A drill is a supervised instruction period aimed at testing, developing and maintaining skills in a particular operation. A drill is often a component of an exercise. A drill shall be supervised and evaluated by a qualified drill instructor. Each organization shall conduct drills, in addition to the biennial⁷ exercise, at the frequencies indicated below:

N.2.a. Evaluation Criterion: Communications Drills: Three types of communication drills are addressed: (a) Communications with State and local governments within the plume exposure pathway emergency planning zone shall be tested monthly; (b) communications with Federal emergency response organizations and State(s) within the ingestion pathway shall be tested at least once quarterly in conjunction with the testing of plume exposure pathway measures of the State plan and (c) communications between the nuclear facility, State and local government emergency operations centers and field assessment teams shall be tested at least once every year. Communication drills shall also include the aspect of understanding the content of messages.⁸

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 14, Section III.A, and Florida REMP, Appendix VI, Section XV provides that “Communications between the licensees, state and risk counties will be tested monthly. Communications with federal emergency response organizations will be tested quarterly. Communications between the nuclear power plants, state and local emergency operations centers and field assessment teams will be tested annually. The test of communications with field assessment teams will be incorporated into the exercises.”

Citrus County: Plans are Adequate. The Citrus County REP Plan states communications between Progress Energy and Citrus County Division of Emergency Management will be tested as described in Section 1.3.2.4 “Emergency Communications”. The test of communications with field response and monitoring teams should be incorporated into the exercises.

Levy County: Plans are Adequate. The Levy County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Marion County: Plans are Adequate. The Marion County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

⁷ Revised by FEMA GM PR-1.

⁸ Revised by FEMA GM PR-1.

Plan Reference

State of Florida

- Florida REMP, Chapter 14, Section III.A
- Florida REMP, Appendix VI, Section XV

Citrus County

- Radiological Emergency Preparedness Plan

Levy County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section III

Marion County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section III

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- N.2.c. Evaluation Criterion: Medical Emergency Drills: A medical emergency drill involving a simulated contaminated individual which contains provisions for participation by local support services agencies (i.e., ambulance and offsite medical treatment facility) shall be conducted annually. The offsite portions of the medical drill may be performed as part of the required biennial exercise.⁹

Criterion Statement:

State of Florida: Not Applicable

Chapter 14 of the State Annex states emergency medical service drills involving a simulated radiologically contaminated individual(s) will be conducted annually for each site. Participation by local emergency medical services and contract hospitals will be required for evaluation by the Federal Emergency Management Agency biennially because of each site having two hospitals.

Citrus County: Plans are Adequate. The Citrus County REP Plan provides for “Emergency Medical Services drills (MS-1) involving a simulated radiological contaminated injured person(s) conducted biennially for the LNP. Participation by Nature Coast EMS, Seven Rivers Regional Medical Center and Citrus Memorial Hospitals will be required for evaluation by FEMA biennially.”

⁹ Revised by FEMA GM MS-1.

Levy County: Plans are Adequate. The Levy County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Marion County: Plans are adequate. The Marion County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Plan Reference

State of Florida

- Florida REMP, Chapter 14, Section III.B
- Florida REMP, Appendix VI, Section XV

Citrus County

- Citrus County REP Plan, Section II.3.3.2.2

Levy County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section III

Marion County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section III

Criterion Evaluation

| | |
|-------------------|-----------------------|
| State of Florida: | Not Applicable |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

N.2.d. Evaluation Criterion: Radiological Monitoring Drills: Requirements are set forth for two types of radiological monitoring drills: (a) Radiological monitoring drills related to the plume exposure pathway emergency planning zone shall be conducted at least annually and shall include provisions for communications and record keeping. (b) Radiological monitoring drills related to the ingestion exposure pathway emergency planning zone shall be conducted at least annually and shall include provisions for communications and record keeping.¹⁰

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 14, Section III.C, and Florida REMP, Appendix VI, Section XV provide that “Radiological monitoring drills for state and appropriate county radiological monitors will be conducted as part of the required exercises. These drills will include collection and analysis of sampling media, provisions for communications, and record keeping.”

¹⁰ Revised by FEMA GM PR-1.

Citrus County: Not Applicable
Levy County: Not Applicable
Marion County: Not Applicable

Plan Reference

State of Florida

- Florida REMP, Chapter 14, Section III.C
- Florida REMP, Appendix VI, Section XV

Criterion Evaluation

| | |
|-------------------|-----------------------|
| State of Florida: | Adequate |
| Citrus County: | Not Applicable |
| Levy County: | Not Applicable |
| Marion County: | Not Applicable |

N.2.e. Evaluation Criterion: Health Physics Drills Health Physics drills shall be conducted semi-annually which involve response to, and analysis of, simulated elevated airborne and liquid samples and direct radiation measurements in the environment. The State drills need not be at each site.¹¹

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 14, Section III.D states “Health physics drills for state emergency response personnel will be conducted semi-annually involving response to and analysis of simulated elevated airborne and liquid samples and direct radiation measurements in the environment. One drill will be conducted in conjunction with the scheduled exercise the other will be conducted in conjunction with annual training.”

Citrus County: Not Applicable
Levy County: Not Applicable
Marion County: Not Applicable

Plan Reference

State of Florida

- Florida REMP, Chapter 14, Section III.D
- Florida REMP, Chapter 9, Section III.A

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
|-------------------|-----------------|

¹¹ Revised by FEMA GM PR-1.

Citrus County: **Not Applicable**
Levy County: **Not Applicable**
Marion County: **Not Applicable**

- N.3. Each organization shall describe how exercises and drills are to be carried out to allow free play for decision making and to meet the following objectives. Pending the development of exercise scenarios and exercise evaluation guidance by NRC and FEMA the scenarios for use in exercises and drills shall include, but not be limited to, the following:
- N.3.a Evaluation Criterion: The basic objective(s) of each drill and exercise and appropriate evaluation criteria;

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 14, Section II.F.2 states “Scenarios will be varied from year to year so all major elements of the plan, and preparedness organizations, are tested within a six-year period. The scenarios will include but not be limited to the following: a. Objectives of the exercise and appropriate evaluation criteria.”

Citrus County: Plans are Adequate. The Citrus County REP Plan states pending the development of exercise scenarios by Progress Energy and the Florida Division of Emergency Management before each FEMA observed exercise, the REP Coordinator will coordinate with the appropriate County, State and Progress Energy personnel the following information:

A). the basic objective(s) of the exercise and appropriate evaluation criteria.

Levy County: Plans are Adequate. The Levy County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Marion County: Plans are Adequate. The Marion County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Plan Reference

State of Florida

- Florida REMP, Chapter 14, Section II.F.2
- Florida REMP, Appendix VI, Section XV

Citrus County

- Citrus County REP Plan, Section III.3.3.3

Levy County

- Radiological Emergency Response Plan

- Florida REMP, Chapter 14, Section II
- Marion County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section II

Criterion Evaluation

State of Florida: **Adequate**
Citrus County: **Adequate**
Levy County: **Adequate**
Marion County: **Adequate**

N.3.b Evaluation Criterion: The date(s), time period, place(s) and participating organizations;

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 14, Section II.F.2 states “Scenarios will be varied from year to year so all major elements of the plan, and preparedness organizations, are tested within a six-year period. The scenarios will include but not be limited to the following: [...] b. Dates, time period, places, and participating organizations”

Citrus County: Plans are Adequate. The Citrus County REP Plan states pending the development of exercise scenarios by Progress Energy and the Florida Division of Emergency Management before each FEMA observed exercise, the REP Coordinator will coordinate with the appropriate County, State and Progress Energy personnel the following information:

C). The date, time period, place and participating organizations.

Levy County: Plans are Adequate. The Levy County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Marion County: Plans are adequate. The Marion County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Plan Reference

State of Florida

- Florida REMP, Chapter 14, Section II.F.2
- Florida REMP, Appendix VI, Section XV

Citrus County

- Citrus County REP Plan

Levy County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section II

Marion County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section II

Criterion Evaluation

State of Florida: **Adequate**
Citrus County: **Adequate**
Levy County: **Adequate**
Marion County: **Adequate**

N.3.c Evaluation Criterion: The simulated events;

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 14, Section II.F.2 states “Scenarios will be varied from year to year so all major elements of the plan, and preparedness organizations, are tested within a six-year period. The scenarios will include but not be limited to the following: [...] c. Simulated events”

Citrus County: Plans are Adequate. The Citrus County REP Plan states pending the development of exercise scenarios by Progress Energy and the Florida Division of Emergency Management before each FEMA observed exercise, the REP Coordinator will coordinate with the appropriate County, State and Progress Energy personnel the following information:

D). the simulated events.

Levy County: Plans are Adequate. The Levy County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Marion County: Plans are Adequate. The Marion County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Plan Reference

State of Florida

- Florida REMP, Chapter 14, Section II.F.2
- Florida REMP, Appendix VI, Section XV

Citrus County

- Citrus County REP Plan, Section III.3.3.3

Levy County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section II

Marion County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section II

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

N.3.d Evaluation Criterion: A time schedule of real and simulated initiating events;

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 14, Section II.F.2 states “Scenarios will be varied from year to year so all major elements of the plan, and preparedness organizations, are tested within a six-year period. The scenarios will include but not be limited to the following: [...] d. Time schedule of simulated and initiating events”

Citrus County: Plans are Adequate. The Citrus County REP Plan states pending the development of exercise scenarios by Progress Energy and the Florida Division of Emergency Management before each FEMA observed exercise, the REP Coordinator will coordinate with the appropriate County, State and Progress Energy personnel the following information:

E). A time schedule of real and/or simulated events.

Levy County: Plans are Adequate. The Levy County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Marion County: Plans are adequate. The Marion County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Plan Reference

State of Florida

- Florida REMP, Chapter 14, Section II.F.2
- Florida REMP, Appendix VI, Section XV

Citrus County

- Citrus County REP Plan, Section III.3.3.3

Levy County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section II

Marion County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section II

Criterion Evaluation

State of Florida: **Adequate**
Citrus County: **Adequate**
Levy County: **Adequate**
Marion County: **Adequate**

- N.3.e Evaluation Criterion: A narrative summary describing the conduct of the exercises or drills to include such things as simulated casualties, offsite fire department assistance, rescue of personnel, use of protective clothing, deployment of radiological monitoring teams, and public information activities; and

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 14, Section II.F.2 states “Scenarios will be varied from year to year so all major elements of the plan, and preparedness organizations, are tested within a six-year period. The scenarios will include but not be limited to the following: [...] e. Narrative summary describing the conduct of the exercise.”

Citrus County: Plans are Adequate. The Citrus County REP Plan states pending the development of exercise scenarios by Progress Energy and the Florida Division of Emergency Management before each FEMA observed exercise, the REP Coordinator will coordinate with the appropriate County, State and Progress Energy personnel the following information:

F). A narrative summary describing the conduct of the exercises or drills to include required simulated events.

Levy County: Plans are Adequate. The Levy County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Marion County: Plans are adequate. The Marion County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Plan Reference

State of Florida

- Florida REMP, Chapter 14, Section II.F.2
- Florida REMP, Appendix VI, Section XV

Citrus County

- Citrus County REP Plan

Levy County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section II

Marion County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section II

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

N.3.f Evaluation Criterion: A description of the arrangements for and advance materials to be provided to official observers.

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 14, Section II.F.2 states “Scenarios will be varied from year to year so all major elements of the plan, and preparedness organizations, are tested within a six-year period. The scenarios will include but not be limited to the following: [...] f. Description of arrangements for advance materials to be provided to observers.”

Citrus County: Plans are Adequate. The Citrus County REP Plan states pending the development of exercise scenarios by Progress Energy and the Florida Division of Emergency Management before each FEMA observed exercise, the REP Coordinator will coordinate with the appropriate County, State and Progress Energy personnel the following information:

G) Description of arrangements for advance materials to be provided to observers.

Levy County: Plans are Adequate. The Levy County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Marion County: Plans are adequate. The Marion County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Plan Reference

State of Florida

- Florida REMP, Chapter 14, Section II.F.2
- Florida REMP, Appendix VI, Section XV

Citrus County

- Citrus County REP Plan

Levy County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section II

Marion County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section II

Criterion Evaluation

State of Florida: **Adequate**
Citrus County: **Adequate**
Levy County: **Adequate**
Marion County: **Adequate**

- N.4. Evaluation Criterion: Official observers from Federal, State or local governments will observe, evaluate, and critique the required exercises. A critique shall be scheduled at the conclusion of the exercise to evaluate the ability of organizations to respond as called for in the plan. The critique shall be conducted as soon as practicable after the exercise, and a formal evaluation should result from the critique.

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 14, Section III.G provides for a critique to be conducted after each exercise and an after-action report to be prepared.

Chapter 14 of the State Annex states a critique will be conducted after each exercise to evaluate the capability of participating state and local governments to implement emergency preparedness plans and procedures in response to a nuclear power plant emergency. Observers from the Division of Emergency Management, the Bureau of Radiation Control or other non-participating risk counties will observe, evaluate and critique off-site response during each annual exercise.

Citrus County: Plans are Adequate. The Citrus County REP Plan provides for a critique to be conducted after each exercise and an after-action report to be prepared.

Levy County: Plans are Adequate. The Levy County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Marion County: Plans are adequate. The Marion County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Plan Reference

State of Florida

- Florida REMP, Chapter 14, Section III.G
- Florida REMP, Appendix VI, Section XV

Citrus County

- Citrus County REP Plan

Levy County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section II

Marion County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section II

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- N.5. Evaluation Criterion: Each organization shall establish means for evaluating observer and participant comments on areas needing improvement, including emergency plan procedural changes, and for assigning responsibility for implementing corrective actions. Each organization shall establish management control used to ensure that corrective actions are implemented.

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 14, Section III.G.2 states “Participating agencies will be requested to submit critique notes in writing as input for an after-action report on the exercise. The after-action report will contain all weaknesses and strengths noted and will be grouped according to operational area. The report will then be forwarded to the appropriate operational section for implementation and correction.”

Citrus County: Plans are Adequate. The Citrus County REP Plan states a critique will be conducted after each exercise to evaluate the capability of the participation of State and Citrus County Emergency Management Division to implement the REP Plan and SOPs in response to a nuclear plant emergency. Participating agencies may be requested to submit critique notes in writing as input for an After-Action Report on the exercise.

The After-Action Report will contain all deficiencies and strengths noted and will be grouped according to operational area. The deficiencies will then be forwarded to the appropriate operational section for implementation and correction.

Levy County: Plans are Adequate. The Levy County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Marion County: Plans are adequate. The Marion County REP Plan states exercises and drills will be conducted and scheduled in accordance with the guidelines outlined in Chapter 14 (Exercises and Drills) of the State Annex.

Plan Reference

State of Florida

- Florida REMP, Chapter 14, Section III.G.2
- Florida REMP, Appendix VI, Section XV

Citrus County

- Citrus County REP Plan, Section III.3.3.4

Levy County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section II

Marion County

- Radiological Emergency Response Plan
- Florida REMP, Chapter 14, Section II

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

O. Radiological Emergency Response Training Planning Standard: Radiological emergency response training is provided to those who may be called on to assist in an emergency.

O.1. Evaluation Criterion: Each organization shall assure the training of appropriate individuals.

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 15 states the purpose of this chapter is to establish a training program that will ensure that the radiological emergency response training mandated in NUREG-0654 is provided for emergency response personnel for decision making, planning, and response. A radiological emergency response training program has been developed. As part of this program the

Statewide Training Task Force has been developed. The Task Force is comprised of various county, licensee and state personnel. The task force meets annually to oversee training needs and address training policy recommendations response personnel to be trained and outlines required training.

Citrus County: Plans are Adequate. The Citrus County REP Plan states it establishes a suitable training program that is specifically oriented toward radiological emergencies for all County Emergency Response Agencies including support organizations. This training program will provide for periodic retraining on an annual basis. The training program must ensure that the guidelines listed in the **NUREG-0654** are provided for the emergency response personnel for decision making, planning and response.

Levy County: Plans are Adequate. The Levy County REP Plan states the County Emergency Operations/Management Director, or designee is responsible for assuring that appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

In addition, the Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Marion County: Plans are adequate. The Marion County REP Plan states the County Emergency Operations/Management Director, or designee is responsible for assuring that appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

In addition, the Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Plan Reference

State of Florida

- Florida REMP, Chapter 15
- Florida REMP, Appendix VI, Section XVI

Citrus County

- Citrus County REP Plan

Levy County

- Levy County REP Plan
- Florida REMP, Chapter 15

Marion County

- Marion County REP Plan
- Florida REMP, Chapter 15

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- O.1.b. Evaluation Criterion: Each offsite response organization shall participate in and receive training. Where mutual aid agreements exist between local agencies such as fire, police and ambulance/rescue, the training shall also be offered to the other departments who are members of the mutual aid district.

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 15 states the state and local organizations which require radiological emergency response training and the required levels of training are shown in Figures 15-1 through 15-3. Specific tasks and responsibilities of each state and local agency are listed in the radiological emergency training standard operating procedures according to the appropriate site involved. Additional state agency training will be provided based on local governments' resource short falls. Risk, host, and ingestion pathway counties will identify the type and amount of personnel resources required of the state to supplement their local response organizations operations.

Citrus County: Plans are Adequate. The Citrus County REP Plan outlines required training for offsite response organizations and states "Training will be offered to 100 % of the agencies and organizations responding to radiological emergencies."

Levy County: Plans are Adequate. The Levy County REP Plan states the County Emergency Operations/Management Director, or their designee are responsible for assuring that appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

In addition, the Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Marion County: Plans are Adequate. The Marion County REP Plan states the County Emergency Operations/Management Director, or their designee are responsible for assuring that appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

In addition, the Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Plan Reference

State of Florida

- Florida REMP, Chapter 15
- Florida REMP, Appendix VI, Section XVI

Citrus County

- Citrus County REP Plan

Levy County

- Levy County REP Plan
- Florida REMP, Chapter 15

Marion County

- Marion County REP Plan
- Florida REMP, Chapter 15

Criterion Evaluation

State of Florida: **Adequate**

Citrus County: **Adequate**

Levy County: **Adequate**

Marion County: **Adequate**

O.4 Each organization shall establish a training program for instructing and qualifying personnel who will implement radiological emergency response plans. The specialized initial training and periodic retraining programs (including the scope, nature and frequency) shall be provided in the following categories¹²:

O.4.a. Evaluation Criterion: Directors or coordinators of the response organizations;

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 15 establishes a training program which satisfies the requirements for the specified individuals.

Chapter 15 of the State Annex states State and local organizations which require radiological emergency response training and the required levels of training are shown in Figures 15-1 through 15-3. Specific tasks and responsibilities of each state and local agency are listed in the radiological emergency training standard operating procedures according to the appropriate site involved.

Additional state agency training will be provided based on local governments' resource short falls. Risk, host, and ingestion pathway counties will identify the type and amount of personnel resources required of the state to supplement their local response organizations operations.

¹² Revised by FEMA GM PR-1.

Citrus County: Plans are Adequate. The Citrus County REP Plan states County organizations which require Radiological Emergency Response training and the required levels of training are shown in **Figure 27 “Levels of Training Needed for County Personnel”**.

Specific tasks and responsibilities of each agency responding to a Radiological Emergency are described in their associated REP SOPs.

Additional State agency training will be provided based on County government resources short falls. The REP Coordinator will identify the type and amount of personnel resources required of the State to supplement the County’s response organizations operations.

Levy County: Plans are Adequate. The Levy County REP Plan states the County Emergency Operations/Management Director, or designee is responsible for assuring that appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

In addition, the Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Marion County: Plans are Adequate. The Marion County REP Plan states the County Emergency Operations/Management Director, or designee is responsible for assuring that appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

In addition, the Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Plan Reference

State of Florida

- Florida REMP, Chapter 15
- Florida REMP, Appendix VI, Section XVI

Citrus County

- Citrus County REP Plan, Section II.3.5

Levy County

- Levy County REP Plan
- Florida REMP, Chapter 15

Marion County

- Marion County REP Plan

- Florida REMP, Chapter 15

Criterion Evaluation

State of Florida: **Adequate**
 Citrus County: **Adequate**
 Levy County: **Adequate**
 Marion County: **Adequate**

O.4.b. Evaluation Criterion: Personnel responsible for accident assessment

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 15 states Personnel who would normally be used in a radiological emergency shall receive formal radiological emergency preparedness training. Formal training for additional emergency personnel will be at the discretion of the Emergency Management Director or designee. Formal refresher training will be provided on an annual basis. The Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Citrus County: Not Applicable
Levy County: Not Applicable
Marion County: Not Applicable

Plan Reference

State of Florida
 • Florida REMP, Chapter 15

Criterion Evaluation

State of Florida: **Adequate**
 Citrus County: **Not Applicable**
 Levy County: **Not Applicable**
 Marion County: **Not Applicable**

O.4.c. Evaluation Criterion: Personnel responsible for radiological monitoring teams and radiological analysis personnel.

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 15 states the Florida REMP, Chapter 15 states Personnel who would normally be used in a radiological emergency shall receive formal radiological emergency preparedness training. Formal

training for additional emergency personnel will be at the discretion of the Emergency Management Director or designee. Formal refresher training will be provided on an annual basis. The Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Citrus County: Not applicable

Levy County: Not applicable

Marion County: Not applicable

Plan Reference

State of Florida

- Florida REMP, Chapter 15
- Florida REMP, Appendix VI, Section XVI

Criterion Evaluation

| | |
|-------------------|-----------------------|
| State of Florida: | Adequate |
| Citrus County: | Not Applicable |
| Levy County: | Not Applicable |
| Marion County: | Not Applicable |

O.4.d. Evaluation Criterion: Police, security and fire-fighting personnel;

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 15 establishes a training program which satisfies the requirements for the specified individuals.

Chapter 15 of the State Annex states State and local organizations which require radiological emergency response training and the required levels of training are shown in Figures 15-1 through 15-3. Specific tasks and responsibilities of each state and local agency are listed in the radiological emergency training standard operating procedures according to the appropriate site involved.

Additional state agency training will be provided based on local governments' resource short falls. Risk, host, and ingestion pathway counties will identify the type and amount of personnel resources required of the state to supplement their local response organizations operations.

Citrus County: Plans are Adequate. The Citrus County REP Plan states training and retraining programs are provided for the following Emergency Response Personnel:

A). Fire Rescue and Fire Departments

Levy County: Plans are Adequate. The Levy County REP Plan states the County Emergency Operations/Management Director, or designee is responsible for assuring that appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

Marion County: Plans are adequate. The Marion County REP Plan states the County Emergency Operations/Management Director, or designee is responsible for assuring that appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

Plan Reference

State of Florida

- Florida REMP, Chapter 15
- Florida REMP, Appendix VI, Section XVI

Citrus County

- Citrus County REP Plan, Section II.3.5

Levy County

- Levy County REP Plan
- Florida REMP, Chapter 15

Marion County

- Marion County REP Plan
- Florida REMP, Chapter 15

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

O.4.f. Evaluation Criterion: First aid and rescue personnel;

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 15 establishes a training program which satisfies the requirements for the specified individuals.

Citrus County: Plans are Adequate. The Citrus County REP Plan states training and retraining programs are provided for the following Emergency Response Personnel:

C). Nature Coast Emergency Medical Services (EMS)

Levy County: Plans are Adequate. The Levy County REP Plan states the County Emergency Operations/Management Director, or designee is responsible for assuring that

appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

In addition, the Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Chapter 15 of the State Annex states State and local organizations which require radiological emergency response training and the required levels of training are shown in Figures 15-1 through 15-3. Specific tasks and responsibilities of each state and local agency are listed in the radiological emergency training standard operating procedures according to the appropriate site involved.

Additional state agency training will be provided based on local governments' resource short falls. Risk, host, and ingestion pathway counties will identify the type and amount of personnel resources required of the state to supplement their local response organizations operations.

Marion County: Plans are adequate. The Marion County REP Plan states the County Emergency Operations/Management Director, or designee is responsible for assuring that appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

In addition, the Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Chapter 15 of the State Annex states State and local organizations which require radiological emergency response training and the required levels of training are shown in Figures 15-1 through 15-3. Specific tasks and responsibilities of each state and local agency are listed in the radiological emergency training standard operating procedures according to the appropriate site involved.

Additional state agency training will be provided based on local governments' resource short falls. Risk, host, and ingestion pathway counties will identify the type and amount of personnel resources required of the state to supplement their local response organizations operations.

Plan Reference

State of Florida

- Florida REMP, Chapter 15
- Florida REMP, Appendix VI, Section XVI

Citrus County

- Citrus County REP Plan, Section II.3.5

Levy County

- Levy County REP Plan
- Florida REMP, Chapter 15

Marion County

- Marion County REP Plan
- Florida REMP, Chapter 15

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- O.4.g. Evaluation Criterion: Local support services personnel including Civil Defense/Emergency Service personnel;

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 15 establishes a training program which satisfies the requirements for the specified individuals.

Citrus County: Plans are Adequate. The Citrus County REP Plan states Personnel who would normally be used in a radiological emergency shall receive formal radiological emergency preparedness training. Formal training for additional emergency personnel will be at the discretion of the Emergency Management Director or designee. Formal refresher training will be provided on an annual basis. The Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Levy County: Plans are Adequate. The Levy County REP Plan states the County Emergency Operations/Management Director, or designee is responsible for assuring that appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

In addition, the Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Chapter 15 of the State Annex states State and local organizations which require radiological emergency response training and the required levels of training are shown in Figures 15-1 through 15-3. Specific tasks and responsibilities of each state and local

agency are listed in the radiological emergency training standard operating procedures according to the appropriate site involved.

Additional state agency training will be provided based on local governments' resource short falls. Risk, host, and ingestion pathway counties will identify the type and amount of personnel resources required of the state to supplement their local response organizations operations.

Marion County: Plans are adequate. The Marion County REP Plan states the County Emergency Operations/Management Director, or designee is responsible for assuring that appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

In addition, the Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Chapter 15 of the State Annex states State and local organizations which require radiological emergency response training and the required levels of training are shown in Figures 15-1 through 15-3. Specific tasks and responsibilities of each state and local agency are listed in the radiological emergency training standard operating procedures according to the appropriate site involved.

Additional state agency training will be provided based on local governments' resource short falls. Risk, host, and ingestion pathway counties will identify the type and amount of personnel resources required of the state to supplement their local response organizations operations.

Plan Reference

State of Florida

- Florida REMP, Chapter 15
- Florida REMP, Appendix VI, Section XVI

Citrus County

- Citrus County REP Plan, Section II.

Levy County

- Levy County REP Plan
- Florida REMP, Chapter 15

Marion County

- Marion County REP Plan
- Florida REMP, Chapter 15

Criterion Evaluation

State of Florida: **Adequate**

Citrus County: **Adequate**
Levy County: **Adequate**
Marion County: **Adequate**

O.4.h. Evaluation Criterion: Medical support personnel;

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 15 establishes a training program which satisfies the requirements for the specified individuals.

Chapter 15 of the State Annex states State and local organizations which require radiological emergency response training and the required levels of training are shown in Figures 15-1 through 15-3. Specific tasks and responsibilities of each state and local agency are listed in the radiological emergency training standard operating procedures according to the appropriate site involved.

Additional state agency training will be provided based on local governments' resource short falls. Risk, host, and ingestion pathway counties will identify the type and amount of personnel resources required of the state to supplement their local response organizations operations.

Citrus County: Plans are Adequate. The Citrus County REP Plan states training and retraining programs are provided for the following Emergency Response Personnel:
C). Nature Coast Emergency Medical Services (EMS)

Levy County: Plans are Adequate. The Levy County REP Plan states the County Emergency Operations/Management Director, or designee is responsible for assuring that appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

In addition, the Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Marion County: Plans are adequate. The Marion County REP Plan states the County Emergency Operations/Management Director, or designee is responsible for assuring that appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

In addition, the Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Plan Reference

State of Florida

- Florida REMP, Chapter 15
- Florida REMP, Appendix VI, Section XVI

Citrus County

- Citrus County REP Plan, Section II.

Levy County

- Levy County REP Plan
- Florida REMP, Chapter 15

Marion County

- Marion County REP Plan
- Florida REMP, Chapter 15

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- O.4.j. Evaluation Criterion: Personnel responsible for transmission of emergency information and instructions.

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 15 establishes a training program which satisfies the requirements for the specified individuals.

Chapter 15 of the State Annex states State and local organizations which require radiological emergency response training and the required levels of training are shown in Figures 15-1 through 15-3. Specific tasks and responsibilities of each state and local agency are listed in the radiological emergency training standard operating procedures according to the appropriate site involved.

Additional state agency training will be provided based on local governments' resource short falls. Risk, host, and ingestion pathway counties will identify the type and amount of personnel resources required of the state to supplement their local response organizations operations.

Citrus County: Plans are Adequate. The Citrus County REP Plan states personnel who would normally be used in a radiological emergency shall receive formal radiological emergency preparedness training. Formal training for additional emergency personnel will be at the discretion of the Emergency Management Director or designee. Formal refresher training will be provided on an annual basis. The Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific

training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Levy County: Plans are Adequate. The Levy County REP Plan states the County Emergency Operations/Management Director, or designee is responsible for assuring that appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

In addition, the Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Marion County: Plans are adequate. The Marion County REP Plan states the County Emergency Operations/Management Director, or designee is responsible for assuring that appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

In addition, the Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Plan Reference

State of Florida

- Florida REMP, Chapter 15
- Florida REMP, Appendix VI, Section XVI

Citrus County

- Citrus County REP Plan, Section II.

Levy County

- Levy County REP Plan
- Florida REMP, Chapter 15

Marion County

- Marion County REP Plan
- Florida REMP, Chapter 15

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- O.5. Evaluation Criterion: Each organization shall provide for the initial and annual retraining of personnel with emergency response responsibilities.

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 15 states training will be conducted as required or a minimum of once per year. Each state and local agency listed in Figures 15-1 through 15-3 will receive Level I, II or III training annually. State and local trainers will determine the appropriate level of training required by each agency based on existing emergency response plans and procedures. Specialized courses will be scheduled as appropriate. All newly assigned emergency response personnel will receive training within one year of assignment.

Citrus County: Plans are Adequate. The Citrus County REP Plan states training will be conducted as required or a minimum of once per year. Each agency listed in **Figure 27, “Levels of Training Needed For County Personnel”**, will receive either Level I, II, III training annually. The REP Coordinator will determine the level of training required by each agency based on existing Emergency Response Plans and procedures. Specialized courses will be scheduled as appropriate. All newly assigned emergency response personnel should receive training within one year of assignment.

Retraining/Refresher

Training sessions may include, but are not limited to the following:

- A). Radiation Protection
- B). Notification
- C). Personnel Dosimetry
- D). Personnel Monitoring using Radiation Instruments
- E). Sheriff’s Office EOC Activation
- F). Reception Centers
- G). Protective Actions
- H). Donning and Removing Protective Clothing
- I). Responding to vehicle accidents containing radioactive materials provides for initial training and annual retraining.

Levy County: Plans are Adequate. The Levy County REP Plan states the County Emergency Operations/Management Director, or their designee are responsible for assuring that appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

In addition, the Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Chapter 15 of the State Annex states training will be conducted as required or a minimum of once per year. Each state and local agency listed in Figures 15-1 through 15-3 will receive Level I, II or III training annually. State and local trainers will determine the appropriate level of training required by each agency based on existing emergency

response plans and procedures. Specialized courses will be scheduled as appropriate. All newly assigned emergency response personnel will receive training within one year of assignment.

Marion County: Plans are adequate. The Marion County REP Plan states the County Emergency Operations/Management Director, or their designee are responsible for assuring that appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

In addition, the Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Plan Reference

State of Florida

- Florida REMP, Chapter 15
- Florida REMP, Appendix VI, Section XVI

Citrus County

- Citrus County REP Plan, Section II.3.5

Levy County

- Levy County REP Plan
- Florida REMP, Chapter 15

Marion County

- Marion County REP Plan
- Florida REMP, Chapter 15

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- P. Responsibility for the Planning Effort
Planning Standard: Development, Periodic Review and Distribution of Emergency Plans
Planning Standard: Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.
- P.1. Evaluation Criterion: Each organization shall provide for the training of individuals responsible for the planning effort.

Criterion Statement:

State of Florida: Plans are adequate. The Florida REMP, Chapter 15 provides for the training of individuals responsible for the planning effort. Specifically, Section III states

that “Radiological emergency planners, at all levels, shall receive continuous radiological planning course specific training that consists of industry, event, or other activity courses deemed appropriate to enhance their skills.”

Citrus County: Plans are adequate. The Citrus County REP Plan states Personnel who would normally be used in a radiological emergency shall receive formal radiological emergency preparedness training. Formal training for additional emergency personnel will be at the discretion of the Emergency Management Director or designee. Formal refresher training will be provided on an annual basis. The Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Levy County: Plans are adequate. The Levy County REP Plan states the County Emergency Operations/Management Director, or their designee are responsible for assuring that appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

In addition, the Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Marion County: Plans are adequate. The Marion County REP Plan states the County Emergency Operations/Management Director, or their designee are responsible for assuring that appropriate county emergency response personnel are adequately trained, in accordance with the training levels and standards outlined in **Chapter 15** (Radiological Emergency Response Training) of the State Annex.

In addition, the Radiological Emergency Planner/Coordinator should receive continuous Radiological Planning Course specific training that consist of industry, event or other activity courses deemed appropriate to enhance his or her skills.

Plan Reference

State of Florida

- Florida REMP, Chapter 15
- Florida REMP, Appendix VI

Citrus County

- Citrus County REP Plan, Section II.

Levy County

- Levy County REP Plan
- Florida REMP, Chapter 15

Marion County

- Marion County REP Plan
- Florida REMP, Chapter 15

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- P.2. Evaluation Criterion: Each organization shall identify by title the individual with the overall authority and responsibility for radiological emergency response planning.

Criterion Statement:

State of Florida: Plans are adequate. The Florida CEMP, Section IV.C.2.a states “Section 252.35(2)(a), Florida Statutes (State Emergency Management Act), grants to the Division of Emergency Management (under the leadership of the Director) the overall authority and responsibility for emergency response planning, plans development, and coordination with other State, local, and federal organizations in the development of emergency plans for the State of Florida.”

Citrus County: Plans are adequate. The Citrus County REP Plan states “the Citrus County Emergency Management Director, through the designation of an REP Coordinator is responsible for the establishment and maintenance of the Citrus County Radiological Emergency Preparedness (REP) Program.” It also provides that the REP Coordinator has the responsibility to “implement all aspects of the REP Program, update and improve the program as necessary, review and update the REP Plan and Procedures (SOPs) with it’s supporting plans and their sources on an annual basis, and keep the Emergency Management Director or designee informed of all information associated with the REP Program.”

Levy County: Plans are adequate. The Levy County REP Plan states the Levy County Board of County Commissioners is responsibility for providing direction and control during any large-scale disaster. Additionally, the Levy County Emergency Management Director is designated as the responsible for emergency planning and emergency response throughout Levy County

Marion County: Plans are adequate. The Marion County REP Plan states the Board of County Commissioners is to support the continuing development of the County’s emergency preparedness program including training, exercises, planning, resource classification and certification and to review and approve the Marion County REP Plan.

The Florida REMP, Appendix VI, Section II.C.1 states that “the Chairman, Marion County Board of County Commissioners, or designee, with the support of the Mayor of Dunnellon, has the overall responsibility for radiological emergency response planning.”

Plan Reference

State of Florida

- Florida CEMP, Section IV.C.2.a
- Florida REMP, Appendix VI, Sections II.B.1

Citrus County

- Citrus County REP Plan
- Citrus County Sheriff's Department Letter dated April 30, 2009

Levy County

- The Levy County REP Plan
- Florida REMP, Appendix VI, Section II.A.1
- Levy County Letter dated April 30, 2009

Marion County

- Marion County REP Plan
- Florida REMP, Appendix VI, Section II.C.1

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- P.3. Evaluation Criterion: Each organization shall designate an Emergency Planning Coordinator with responsibility for the development and updating of emergency plans and coordination of these plans with other response organizations.

Criterion Statement:

State of Florida: Plans are adequate. The Florida CEMP, Section IV.C.2.a states "Section 252.35(2)(a), Florida Statutes (State Emergency Management Act), grants to the Division of Emergency Management (under the leadership of the Director) the overall authority and responsibility for emergency response planning, plans development, and coordination with other State, local, and federal organizations in the development of emergency plans for the State of Florida." The State of Florida Comprehensive Emergency Management Plan is developed with the assistance and input from the State Emergency Response Team serving in an advisory capacity. Pursuant to Section 252.365, Florida Statutes, the State Emergency Response Team (SERT) is established as an advisory body to coordinate with the Division of Emergency Management emergency management functions to prepare for, respond to, recovery from, and mitigate the impact of a variety of hazards that could impact the State of Florida. Relative to the process for the development of the Comprehensive Emergency Management Plan, the State Emergency Response Team advises specifically on such issues as policies, plans, procedures, training, exercises, and public education. The preparation and revision of the Basic Plan and hazard specific annexes will be the responsibility of the Division of

Emergency Management, with the assistance and involvement of all applicable entities, including the State Emergency Response Team. The preparation and revision of the 17 emergency support function appendices are the responsibility of the designated primary agency, with the assistance and involvement of the Division of Emergency Management and the designated support agencies. The Division of Emergency Management will establish format and content guidance that must be followed in the revision and updating process and coordinate and incorporate all revisions to the appendices.

Citrus County: Plans are adequate. The Citrus County REP Plan states the REP Coordinator is responsible for maintaining, updating, improving and the implementation of the REP Program. He or she is responsible for the following activities: Control the distribution of copies of this plan and REP SOPs, prompt distribution of Plan updates, Annual Letter of Certification, and submit revisions of this REP Plan to the Florida Division of Emergency Management and Coordinate with other Emergency Response Agencies.

Levy County: Plans are adequate. The Levy County REP Plan along with the Florida REMP, Appendix VI, Section II.A.2 states the Director of the Levy County Department of Emergency Management, or designee, is responsible for the development and maintenance of procedures for implementing the required portions of this plan consistent with the emergency conditions. The director, or designee, will also provide input for the annual plan revision by the State Division of Emergency Management. The Levy County Emergency Management Director, or designee, will also coordinate overall emergency operations and support needs with the Division of Emergency Management, Citrus County, Marion County, state and Federal support agencies and representatives from Progress Energy.

Marion County: Plans are adequate. The Marion County REP Plan states the Marion County Director of Emergency Management, supported by the staff of the Division of Emergency Management has the responsibility to establish the county's emergency preparedness organization and plan and coordinate its activities.

Plan Reference

State of Florida

- Florida CEMP, Section IV.C.2.a

Citrus County

- Citrus County REP Plan
- Florida REMP, Appendix VI, Sections II.B.2

Levy County

- The Levy County REP Plan
- Florida REMP, Appendix VI, Sections II.A.2

Marion County

- The Marion County REP Plan
- Florida REMP, Appendix VI, Sections II.C.2

Criterion Evaluation

State of Florida: **Adequate**
Citrus County: **Adequate**
Levy County: **Adequate**
Marion County: **Adequate**

- P.4 Evaluation Criterion: Each organization shall update its plan and agreements as needed, review and certify it to be current on an annual basis. The update shall take into account changes identified by drills and exercises.

Criterion Statement:

State of Florida: Plans are adequate. The REMP states that the Director of the Division of Emergency Management will annually certify the REMP to be current and that site specific plans will be approved by the local officials in accordance with their procedures.

Citrus County: Plans are adequate. The Citrus County REP Plan states the REP Coordinator is responsible for maintaining, updating, improving and the implementation of the REP Program. The REP Coordinator is responsible for plan updates and their distribution, submitting revisions to FDEM and the County's Annual Letter of Certification.

Levy County: Plans are adequate. The Levy County REP Plan along with the Florida REMP, Appendix VI, Section II.A.2 states the Director of the Levy County Department of Emergency Management, or designee, is responsible for the development and maintenance of procedures for implementing the plan and to provide input for the annual plan revision.

Marion County: Plans are adequate. The Marion County REP Plan Section II.2 states the Director of the Marion County Department of Emergency Management, or designee, is responsible for the development and maintenance of procedures for implementing the required portions of this plan consistent with the emergency conditions. The director, or designee, will also provide input for annual plan revision by the State Division of Emergency Management. The Marion County Emergency Management Director, or designee, will also coordinate overall emergency operations and support needs with the Division of Emergency Management, Levy County, Citrus County, state and Federal support agencies, and representatives from Progress Energy.

Plan Reference

State of Florida

- Florida REMP, Section I

Citrus County

- Citrus County REP Plan
- Florida REMP, Appendix VI, Sections II.B.2

Levy County

- Levy County REP Plan
- Florida REMP, Appendix VI, Sections II.A.2

Marion County

- The Marion County REP Plan
- Florida REMP, Appendix VI, Sections II.C.2

Criterion Evaluation

State of Florida: **Adequate**

Citrus County: **Adequate**

Levy County: **Adequate**

Marion County: **Adequate**

- P.5 Evaluation Criterion: The emergency response plans and approved changes to the plans shall be forwarded to all organizations and appropriate individuals with responsibility for implementation of the plans. Revised pages shall be dated and marked to show where changes have been made.

Criterion Statement:

State of Florida: Plans are adequate. The Florida CEMP, Section IV.C.2.a states “Section 252.35(2)(a), Florida Statutes (State Emergency Management Act), grants to the Division of Emergency Management (under the leadership of the Director) the overall authority and responsibility for emergency response planning, plans development, and coordination with other State, local, and federal organizations in the development of emergency plans for the State of Florida.” The Division of Emergency Management will establish format and content guidance that must be followed in the revision and updating process and coordinate and incorporate all revisions to the appendices.

Citrus County: Plans are adequate. The Citrus County REP Plan states the REP Coordinator is responsible for maintaining, updating, improving and the implementation of the REP Program. The REP coordinator is responsible for submitting revision of the REP Plans to FLDEM.

Levy County: Plans are adequate. The Levy County REP Plan Section II.2 states the Director of the Marion County Department of Emergency Management, or designee, is responsible for the development and maintenance of procedures for implementing the required portions of this plan consistent with the emergency conditions. The director, or designee, will also provide input for annual plan revision by the State Division of Emergency Management. The Marion County Emergency Management Director, or designee, will also coordinate overall emergency operations and support needs with the Division of Emergency Management, Levy County, Citrus County, state and Federal support agencies, and representatives from Progress Energy.

Marion County: Plans are adequate. The Marion County REP Plan Section II.2 states the Director of the Marion County Department of Emergency Management, or designee,

is responsible for the development and maintenance of procedures for implementing the required portions of this plan consistent with the emergency conditions. The director, or designee, will also provide input for annual plan revision by the State Division of Emergency Management. The Marion County Emergency Management Director, or designee, will also coordinate overall emergency operations and support needs with the Division of Emergency Management, Levy County, Citrus County, state and Federal support agencies, and representatives from Progress Energy.

Plan Reference

State of Florida

- Florida CEMP, Section IV.C.2.a

Citrus County

- Citrus County REP Plan
- Florida REMP, Appendix VI, Sections II.B.2

Levy County

- Levy County REP Plan
- Florida REMP, Appendix VI, Sections II.A.2

Marion County

- Marion County REP Plan
- Florida REMP, Appendix VI, Sections II.C.2

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |
| Marion County: | Adequate |

- P.6 Evaluation Criterion: Each plan shall contain a detailed listing of supporting plans and their source.

Criterion Statement:

State of Florida: Plans are adequate. The Florida CEMP, Section IV.C.2.a states “Section 252.35(2)(a), Florida Statutes (State Emergency Management Act), grants to the Division of Emergency Management (under the leadership of the Director) the overall authority and responsibility for emergency response planning, plans development, and coordination with other State, local, and federal organizations in the development of emergency plans for the State of Florida.” The State of Florida Comprehensive Emergency Management Plan is developed with the assistance and input from the State Emergency Response Team serving in an advisory capacity. Pursuant to Section 252.365, Florida Statutes, the State Emergency Response Team (SERT) is established as an advisory body to coordinate with the Division of Emergency Management emergency management functions to prepare for, respond to, recovery from, and mitigate the impact of a variety of hazards that could impact the State of Florida. Relative to the process for

the development of the Comprehensive Emergency Management Plan, the State Emergency Response Team advises specifically on such issues as policies, plans, procedures, training, exercises, and public education. The preparation and revision of the Basic Plan and hazard specific annexes will be the responsibility of the Division of Emergency Management, with the assistance and involvement of all applicable entities, including the State Emergency Response Team. The preparation and revision of the 17 emergency support function appendices are the responsibility of the designated primary agency, with the assistance and involvement of the Division of Emergency Management and the designated support agencies. The Division of Emergency Management will establish format and content guidance that must be followed in the revision and updating process and coordinate and incorporate all revisions to the appendices.

Additionally, the Florida CEMP, Section VII contains an extensive list of Authorities and References to be used as reference and guidance.

Citrus County: Plans are adequate. The Citrus County REP Plan ensures that each plan shall contain a detailed listing of supporting plans and their source.

Levy County: Plans are adequate. The Levy County REP Plan ensures that each plan shall contain a detailed listing of supporting plans and their source.

Marion County: Plans are adequate. The Marion County REP Plan ensures that each plan shall contain a detailed listing of supporting plans and their source.

Plan Reference

State of Florida
Florida CEMP, Section IV.C.2.a and Section VII

Citrus County
Citrus County REP Plan
Florida CEMP, Section IV.C.2 and Section VII

Levy County
Levy County REP Plan
Florida CEMP, Section IV.C.2 and Section VII

Marion County
Marion County REP Plan
Florida CEMP, Section IV.C.2 and Section VII

Criterion Evaluation

| | |
|-------------------|-----------------|
| State of Florida: | Adequate |
| Citrus County: | Adequate |
| Levy County: | Adequate |

Marion County: **Adequate**

- P.7** Evaluation Criterion: Each plan shall contain as an appendix listing, by title, procedures required to implement the plan. The listing shall include the Section(s) of the plan to be implemented by each procedure.

Criterion Statement:

State of Florida: Plans are adequate. Florida's procedures and SOP's list to implement the plan is not contained in the State Plan. Operating procedures are available on request.

Citrus County: Plans are adequate. The Citrus County REP Plan states the REP Coordinator is responsible for maintaining, updating, improving and the implementation of the REP Program. He or she is responsible for the following activities: Control the distribution of copies of this plan and REP SOPs, prompt distribution of Plan updates, Annual Letter of Certification, and submit revisions of this REP Plan to the Florida Division of Emergency Management and Coordinate with other Emergency Response Agencies.

Levy County: Plans are adequate. The Levy County REP Plan states when a major or catastrophic emergency has occurred or is imminent, the Emergency Management Director may advise the Chairperson of the Board of County Commissioners to declare a local state of emergency and issue a formal request for state assistance. The Levy County Emergency Management Director will assume overall direction and control under guidance from the Board of County Commissioners, or an Executive Committee which may be appointed by the Board of County Commissioners. Such an action will activate immediately all portions of this plan. In the absence of a local state of emergency, the Emergency Management Director may activate portions of this plan in accordance with the appropriate levels of mobilization to facilitate response readiness or monitoring activities.

Marion County: Plans are adequate. The Marion County REP Plan contains an appendix listing, by title, procedures required to implement the plan.

Plan Reference

State of Florida

- Available Upon Request

Citrus County

- Citrus County REP Plan

Levy County

- Levy County REP Plan

Marion County

- The Marion County REP Plan

Criterion Evaluation

State of Florida: **Adequate**
Citrus County: **Adequate.**
Levy County: **Adequate**
Marion County: **Adequate**

- P.8** Evaluation Criterion: Each plan shall contain a specific table of contents. Plans submitted for review should be cross-referenced to these criteria.

Criterion Statement:

State of Florida: Plans are adequate. The State Annex contains a specific table of contents.

Citrus County: Plans are adequate. The Citrus County REP Plan contains a specific table of contents.

Levy County: Plans are adequate. The Levy County REP Plan contains a specific table of contents.

Marion County: Plans are adequate. The Marion County REP Plan contains a specific table of contents.

Plan Reference

State of Florida

- Florida REMP, Table of Contents

Citrus County

- Citrus County REP Plan, Table of Contents

Levy County

- Levy County REP Plan, Table of Contents

Marion County

- Marion County REP Plan, Table of Contents

Criterion Evaluation

State of Florida: **Adequate**
Citrus County: **Adequate**
Levy County: **Adequate**
Marion County: **Adequate**

- P.10** Evaluation Criterion: Each organization shall provide for updating telephone numbers in emergency procedures at least quarterly.

Criterion Statement:

State of Florida: Plans are adequate. Florida REMP, Chapter 6, Section IV states testing of communication systems will be conducted on a regularly scheduled basis as shown in Figure 6-1. Figure 6-1 contains a Communications Systems Testing Chart. Additionally, the State maintains updated telephone contact list, per discussion with the State DEM. Phone systems are used on a regular basis.

Citrus County: Plans are adequate. The Citrus County REP Plan provides for updating telephone numbers in emergency procedures at least quarterly.

Levy County: Plans are adequate. The Levy County REP Plan provides for updating telephone numbers in emergency procedures at least quarterly.

Marion County: Plans are adequate. The Marion County REP Plan provide for updating telephone numbers in emergency procedures at least quarterly.

Plan Reference

State of Florida

- Florida REMP, Chapter 6, Section IV

Citrus County

- Citrus County REP Plan

Levy County

- Levy County REP Plan

Marion County

- Marion County REP Plan

Criterion Evaluation

State of Florida: **Adequate**

Citrus County: **Adequate**

Levy County: **Adequate**

Marion County: **Adequate**

III. Post COL Reasonable Assurance Tracking

This tracking form includes elements that will be completed during the period between the issuing of the combined license and the qualifying exercise. Certain NUREG-0654 evaluation criteria are dependent on things that may not yet exist during the pre-licensing period for new sites, such as facilities or letters of agreement with support organizations.

When a new reactor is added at an existing operating site, plans, procedures, and training are already in place. However, when a new reactor is built at a new site, some or all of the municipalities within the new site's EPZ will not have existing radiological emergency plans.

These municipalities must adopt and complete the proposed plans prepared by the utility, develop detailed procedures, and train responders prior to conducting the qualifying joint exercise. During this period, FEMA works in partnership with State, local, and Tribal governmental and private organizations to create and implement plans, procedures, and training programs.

The Post COL Reasonable Assurance Tracking Form is used to set a schedule for completion of these items that keeps the jurisdictions on track with planning and training activities and leads to a successful qualifying joint exercise.

| Time Frame ¹³ | Evaluation Criterion ¹⁴ | Action Needed and Applicable Exercise Evaluation Methodology ¹⁵ | Resolution Description and Date |
|--------------------------|------------------------------------|--|---|
| E-18 | E.5 (State/Local) | Emergency Alert System procedures are developed. (5.a.1, 5.b.1) | This will be ready for inspection prior to the 2017 exercise. |
| | E.7 (State/Local) | Draft written messages for public. | This will be ready for inspection prior to the 2017 exercise. |
| E-12 | G.2 (State/Local) | A description of the types, locations, means for annual updating, and means of distribution of public information materials is included in the State plan, as appropriate. | This will be ready for inspection prior to the 2017 exercise. |

¹³ E - x = Months prior to qualifying exercise

¹⁴ NUREG 0654 FEMA-REP-1 Rev 1

¹⁵ Federal Register Vol. 67 No. 80, April 25, 2002

IV. Criterion Rating Summary for Florida and Risk County Radiological Emergency Plans

Any blank space in the table below will be evaluated prior to the IFR on Reasonable Assurance on the Adequacy of Offsite Radiological Emergency Response Preparedness.

| Element | Rating | | | | Element | Rating | | | |
|---------|---------|-------------|---------------|---------------|----------|---------|-------------|---------------|---------------|
| | Florida | Levy County | Citrus County | Marion County | | Florida | Levy County | Citrus County | Marion County |
| A.1.a | A | A | A | A | J.10.g | A | A | A | A |
| A.1.b | A | A | A | A | J.10.h | A | A | A | A |
| A.1.c | A | A | A | A | J.10.i | A | A | A | A |
| A.1.d | A | A | A | A | J.10.j | A | A | A | A |
| A.1.e | A | A | A | A | J.10.k | A | A | A | A |
| A.2.a | A | A | A | A | J.10.l | A | A | A | A |
| A.2.b | A | A | A | A | J.10.m | A | N/A | N/A | N/A |
| A.3 | A | A | A | A | J.11 | A | N/A | N/A | N/A |
| A.4 | A | A | A | A | J.12 | A | A | A | A |
| C.1.a | A | N/A | N/A | N/A | K.3.a | A | A | A | A |
| C.1.b | A | N/A | N/A | N/A | K.3.b | A | A | A | A |
| C.1.c | A | A | A | A | K.4 | A | A | A | A |
| C.2.a | A | A | A | A | K.5.a | A | A | A | A |
| C.3 | A | N/A | N/A | N/A | K.5.b | A | A | A | A |
| C.4 | A | A | A | A | L.1 | A | A | A | A |
| D.3 | A | A | A | A | L.3 | A | N/A | N/A | N/A |
| D.4 | A | A | A | A | L.4 | A | A | A | A |
| E.1 | A | A | A | A | M.1 | A | A | A | A |
| E.2 | A | A | A | A | M.3 | A | N/A | N/A | N/A |
| E.5 | A | A | | | M.4 | A | N/A | N/A | N/A |
| E.6 | A | A | A | A | N.1.a | A | A | A | A |
| E.7 | A | A | A | | N.1.b | A | A | A | A |
| F.1.a | A | A | A | A | N.2.a | A | A | A | A |
| F.1.b | A | A | A | A | N.2.c | N/A | A | A | A |
| F.1.c | A | A | A | A | N.2.d | A | N/A | N/A | N/A |
| F.1.d | A | A | A | A | N.2.e(1) | A | N/A | N/A | N/A |
| F.1.e | A | A | A | A | N.3.a | A | A | A | A |
| F.2 | A | A | A | A | N.3.b | A | A | A | A |
| F.3 | A | A | A | A | N.3.c | A | A | A | A |
| G.1 | A | A | A | A | N.3.d | A | A | A | A |
| G.2 | A | | | | N.3.e | A | A | A | A |
| G.3.a | A | A | A | A | N.3.f | A | A | A | A |
| G.4.a | A | A | A | A | N.4 | A | A | A | A |
| G.4.b | A | A | A | A | N.5 | A | A | A | A |
| G.4.c | A | A | A | A | O.1 | A | A | A | A |
| G.5 | A | A | A | A | O.1.b | A | A | A | A |

| Element | Rating | | | | Element | Rating | | | |
|---------|---------|-------------|---------------|---------------|---------|---------|-------------|---------------|---------------|
| | Florida | Levy County | Citrus County | Marion County | | Florida | Levy County | Citrus County | Marion County |
| H.3 | A | A | A | A | O.4.a | A | A | A | A |
| H.4 | A | A | A | A | O.4.b | A | N/A | N/A | N/A |
| H.7 | A | N/A | N/A | N/A | O.4.c | A | N/A | N/A | N/A |
| H.10 | A | A | A | A | O.4.d | A | A | A | A |
| H.11 | A | A | A | A | O.4.f | A | A | A | A |
| H.12 | A | N/A | N/A | N/A | O.4.g | A | A | A | A |
| I.7 | A | N/A | N/A | N/A | O.4.h | A | A | A | A |
| I.8 | A | N/A | N/A | N/A | O.4.j | A | A | A | A |
| I.9 | A | N/A | N/A | N/A | O.5 | A | A | A | A |
| I.10 | A | N/A | N/A | N/A | P.1 | A | A | A | A |
| I.11 | A | N/A | N/A | N/A | P.2 | A | A | A | A |
| J.2 | A | N/A | A | N/A | P.3 | A | A | A | A |
| J.9 | A | A | A | A | P.4 | A | A | A | A |
| J.10.a | A | A | A | A | P.5 | A | A | A | A |
| J.10.b | A | A | A | A | P.6 | A | A | A | A |
| J.10.c | A | A | A | A | P.7 | A | A | A | A |
| J.10.d | A | A | A | A | P.8 | A | A | A | A |
| J.10.e | A | A | A | A | P.10 | A | A | A | A |
| J.10.f | A | A | A | A | | | | | |

A = Adequate

N/A = Not applicable for the planning criterion

Blank Spaces are referenced on the Post COL Reasonable Assurance Tracking Form

V. Reasonable Assurance

After a thorough review of currently available Offsite Plans and Procedures, based upon the standards and criteria of NUREG-0654 FEMA-REP-1, Rev. 1, a determination has been made that the plans are adequate and there is Reasonable Assurance that the plans can be implemented with no corrections needed. A qualifying REPEX will be demonstrated by the Levy County Nuclear Power Station in conjunction with Offsite State and County's participation.

VI. Acronyms and Definitions:

| Acronym | Definition |
|---------|---|
| ACP | Access Control Point |
| ARC | American Red Cross |
| CDE | Committed Dose Equivalent |
| CFM | Cubic Feet per Minute |
| CIO | Chief Information Officer |
| COL | Combined License |
| DHS | (U.S.) Department of Homeland Security |
| DIL | Derived Intervention Level |
| DOE | (U.S.) Department of Energy |
| DOT | Department of Transportation |
| DRD | Direct Reading Dosimeter |
| DROC | Disaster Recovery Operations Center |
| EAL | Emergency Action Level |
| EAS | Emergency Alert System |
| ECL | Emergency Classification Level |
| ECV | Emergency Communications Vehicle |
| EMA | Emergency Management Agency |
| EMAC | Emergency Management Assistance Compact |
| EMI | Emergency Management Institute |
| EMS | Emergency Medical Services |
| ENF | Emergency Notification Form |
| EOC | Emergency Operations Center |
| EOP | Emergency Operations Plan |
| EPA | (U.S.) Environmental Protection Agency |
| EPZ | Emergency Planning Zone |
| ERPA | Emergency Response Planning Area |
| ERT | Emergency Response Team |
| ESC | Emergency Services Coordinator |
| ESF | Emergency Support Function |
| ETE | Evacuation Time Estimate |
| EW | Emergency Worker |
| FDA | (U.S.) Food and Drug Administration |
| FEMA | Federal Emergency Management Agency |
| FEOC | Forward Emergency Operations Center |
| FMT | Field Monitoring Team |
| FNF | Fixed Nuclear Facility |
| FRMAC | Federal Radiological Monitoring and Assessment Center |
| GE | General Emergency |
| G-M | Geiger-Mueller |
| HHS | Health and Human Services |
| IOF | Interim Operating Facility |
| IPZ | Ingestion Pathway Zone |
| JIC | Joint Information Center |

| Acronym | Definition |
|----------------|---|
| KI | Potassium Iodide |
| LGR | Local Government Radio |
| LNP | Levy Nuclear Plant Unit 1 and Unit 2 |
| LOA | Letter of Agreement |
| MOC | Mobile Operations Center |
| MOU | Memorandum of Understanding |
| mR/hr | milli-Roentgen per hour |
| MRL | Mobile Radiological Laboratory |
| MS-1 | Medical Services Drill |
| NAWAS | National Warning Systems |
| NCIS | National Crime Information System |
| NETC | National Emergency Training Center |
| NIMS | National Incident Management System |
| NUE | Notification of Unusual Event |
| NPP | Nuclear Power Plant |
| NRC | (U.S.) Nuclear Regulatory Commission |
| NREES | Nuclear Response and Emergency Environmental Surveillance |
| | National Response Plan (now National Response Framework, March 2008) |
| NRP | |
| NUREG | Nuclear Regulatory Commission Publication |
| NWS | National Weather Service |
| ORO | Offsite Response Organization |
| PAD | Protective Action Decision |
| PAG | Protective Action Guide |
| PAR | Protective Action Recommendation |
| PIO | Public Information Officer |
| PRD | Permanent Record Dosimeter |
| RACES | Radio Amateur Civil Emergency Services |
| RAI | Request for Additional Information |
| RAP | Radiological Assistance Program |
| REA | Radiological Emergency Area |
| REM | Roentgen Equivalent Man |
| REMP | Florida Radiological Emergency Management Plan |
| REP | Radiological Emergency Preparedness |
| SAE | Site Area Emergency |
| SEOC | State Emergency Operations Center |
| SERT | State Emergency Response Team |
| SHP | State Highway Patrol |
| SMRAP | Southern Mutual Radiation Assistance Plan |
| SOP | Standard Operating Procedures |
| SRD | Self Reading Dosimeter |
| SRS | Savannah River Site |
| STOP | Standard Technical Operating Procedures |
| TBD | To Be Determined |
| TCP | Traffic Control Point |

| Acronym | Definition |
|----------------|---------------------------------|
| TEDE | Total Effective Dose Equivalent |
| TLD | Thermoluminescent Dosimeter |
| UHF | Ultra-High Frequency |
| VHF | Very-High Frequency |
| μCi | micro (μ) Curies |