

REQUEST FOR ADDITIONAL INFORMATION
RELATED TO REQUEST FOR APPROVAL OF OYSTER CREEK
NUCLEAR GENERATING STATION INDEPENDENT SPENT FUEL
STORAGE INSTALLATION ONLY EMERGENCY PLAN
HOLTEC DECOMMISSIONING INTERNATIONAL, LLC
DOCKET NOS. 50-219 AND 72-15

By letter dated February 23, 2021 (Agencywide Documents Access and Management System [ADAMS]) Accession No. Main Library [ML] ML21054A321), Holtec Decommissioning International, LLC (HDI) submitted a license amendment request for review and approval of the Oyster Creek Nuclear Generating Station (OCNGS) Independent Spent Fuel Storage Installation Facility (ISFSI) Only Emergency Plan and its associated Emergency Action Level scheme. The proposed changes are being submitted to the U.S. Nuclear Regulatory Commission (NRC) for approval prior to implementation, as required under Paragraph 50.54(q)(4) of Title 10 of the *Code of Federal Regulations* (10 CFR).

The NRC staff has reviewed HDI's submittal and determined that additional information is required to NRC staff to make an independent assessment regarding its technical review. The request for additional information (RAI) is discussed below.

RAI-1

Requirement:

- 10 CFR 50.47(b)(12), requires that arrangements are made for medical services for contaminated injured individuals.
- 10 CFR Part 50, Appendix E.IV.E.6 requires arrangements for transportation of contaminated injured individuals from the site to specifically identified treatment facilities outside the site boundary.
- Associated guidance in NUREG-0654, Section II.B, Evaluation Criterion L.4 states that each licensee shall arrange for transporting victims of radiological accidents to medical facilities.

Issue: Section 5.2.2, "Ambulance Service," of Enclosure 1 Attachment 1, "Oyster Creek ISFSI Only Emergency Plan," states,

Arrangements are made for prompt ambulance transport of persons with injuries involving radioactivity to designated hospitals. Such service is available on a 24-hour per day basis and is confirmed by letter of agreement.

However, previously Section 7.2.3.1, "Local Services," of Attachment 3, "Clean Copy - Permanently Defueled Emergency Plan (PDEP)," in letter dated February 13, 2018 (ADAMS Accession No. ML18044A214), states,

1. Transportation of injured personnel using an ambulance service (Lacey Township, Lanoka Harbor, and Waretown First Aid Squads)

In letter dated October 17, 2018 (ADAMS Accession No. ML18221A400), the NRC issued the amendment approving the proposed permanently defueled emergency plan. The SER stated,

Therefore, the NRC staff concludes that the licensee's proposed Oyster Creek PDEP, as provided in ***Attachment 3 to the licensee's letter dated February 13, 2018***, is acceptable.

The current text in IOEP Section 5.2.2 does not identify what ambulance services are available.

Request: Clarify what ambulance service(s) are confirmed by letter(s) of agreement with the OCNGS ISFSI.

RAI-2

Requirements:

- 10 CFR 50.47(b)(1), as exempted, requires that each principal response organization has staff to respond and augment its initial response on a continuous basis.
- 10 CFR 50.47(b)(2), as exempted, requires on-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times.
- 10 CFR Part 50, Appendix E.IV.A.1, as exempted, requires a description of the normal plant organization. Additionally, Appendix E.IV.A.2, as exempted, requires a description of the onsite emergency response organization (ERO).
- Associated guidance in NUREG-0654, Section II, Evaluation Criterion A.4, states each licensee shall be capable of continuous (24 hour) operation. Evaluation Criteria B.1, states that each licensee shall specify the on-site emergency organization of the plant staff personnel for all shifts and its relation to the responsibilities and duties of the normal staff complement. Evaluation Criteria B.5, states each licensee shall specify the position or title and major tasks to be performed by persons to be assigned to the functional areas of emergency activities.

Issue: Section 6.1 "On-site Positions" of the IOEP only identifies the ISFSI Shift Manager/Security Operations Supervisor (ISS) position. Table 6-1 only identifies the Emergency Director as the on-shift staff to fill all functional areas.

Request: Identify other on-shift positions and types of staff that are available to fill emergency response functions at OCNGS ISFSI. Identify who would assume Emergency Director duties at OCNGS ISFSI if the ISS is incapacitated or somehow unavailable during a shift.

RAI-3

Requirement:

- 10 CFR 50.47(b)(7), as exempted, requires the principal points of contact with news media for dissemination of information during and emergency are established in advance, and procedures for coordinated dissemination of information to the public are established.
- Associated guidance in NUREG-0654, Section II.G, Evaluation Criterion 3.a, states each principal organization shall designate the points of contact and physical location for use by news media during an emergency. Also, Evaluation Criteria 4.a states each licensee shall designate a spokesperson who should have access to all necessary information. Evaluation Criteria 4.b states each licensee shall establish arrangements for timely exchange of information among designated spokespersons. Evaluation Criteria 4.c states each licensee shall establish coordinated arrangements for dealing with rumors.

Issue: In IOEP Section 6.2.1, the Resource Manager is identified as serving as the public information interface. In Section 11.0 "Public Information," corporate public affairs personnel are identified to represent the facility as the company spokesperson, and to disseminate information to the public.

Request: Clarify the apparent duplication of responsibilities between the Resource Manager and corporate public affairs personnel for the OCNGS ISFSI.

RAI-4

Requirement:

- 10 CFR 50.47(b)(5), as exempted, requires procedures have been established for notification, by the licensee, of State and local response organizations....
- 10 CFR Part 50, Appendix E.IV.D.3, as exempted, requires a licensee to have the capability to notify responsible State and local governmental agencies after declaring an emergency.
- Associated guidance in NUREG-0654, Section II.E, Evaluation Criterion E.1. states that each licensee shall establish procedures which describe mutually agreeable bases for notification of response organizations consistent with the emergency classification and action level scheme.

Issue: Section 9.0, "Notification Methods and Procedures," of Enclosure 1 Attachment 1, states, in part:

Procedures are established for the prompt notification to NJ OEM [New Jersey-Office of Emergency Management] and local organizations....

However, previously the response to request for additional information (RAI) OC-03 in Attachment 1, "Response to Request for Additional Information," in letter dated February 13, 2018 states,

Local organization EOCs [Emergency Operations Centers]: Ocean County, Lacey Township, and Ocean Township are notified by the State of New Jersey, as necessary, when an Unusual Event, Alert, or other State EOC notification has been made by the OC Shift Manager. The local county and townships have established this process for the current operating plant and will continue to support this method during this decommissioning period. The Local Warning Points/EOC block on Figure 6.1 [Exelon Notification Scheme] has been revised to indicate the three local EOCs that will be contacted by the State EOC in the attached revised PDEP.

The current text in IOEP Section 9.3.1 does not detail how the local governmental organizations will be notified.

Request: Clarify how the local governmental organizations will be notified of an emergency at the OCNGS ISFSI.

RAI-5

Requirement:

- 10 CFR 50.47(b)(8), as exempted, requires that adequate emergency facilities and equipment to support the emergency response are provided and maintained.
- 10 CFR Part 50, Appendix E.IV.E., as exempted, requires each licensee to describe emergency facilities.
- Associated guidance in NUREG-0654, Section II.H, Evaluation Criterion H.2, states each licensee shall establish an emergency facility from which evaluation and coordination of all licensee activities related to an emergency is to be carried out, and from which the licensee shall provide information to federal, State, and local authorities responding to emergencies. Also, in Evaluation Criteria H.6, each licensee shall make provisions to acquire data from or for emergency access to offsite monitoring and analysis equipment including geophysical phenomena monitors, (e.g., meteorological, and seismic).

Issue: IOEP Section 12.1, "Emergency Response Facilities," identifies the Emergency Response Facility (ERF) as the facility from which command and control functions are managed. However, the IOEP does not identify the location of the ERF. The IOEP does not include information on the availability of, or access to geophysical phenomena monitors.

Request: Provide the location of the ERF for the OCNGS ISFSI. Provide information on the availability of or access to geophysical phenomena monitors for the OCNGS ISFSI.

RAI-6

Requirement:

- 10 CFR 50.47(b)(10), as exempted, requires that a range of protective actions has been developed for emergency workers.
- Associated guidance in NUREG-0654, Section II.J, Evaluation Criterion J.2, states each licensee shall make provisions for evacuation routes and transportation for onsite individuals. Also, Evaluation Criteria J.3 states each licensee shall provide for radiological monitoring of people evacuated from the site. Further, Evaluation Criteria J.6 states licensees shall make provisions for the use of individual respiratory protection.

Issue: The IOEP does not address evacuation routes or transportation for onsite individuals, radiological monitoring of site evacuees, or the provision of respiratory protective equipment.

Request: Provide information on evacuation routes, monitoring of people evacuated from the site, and provision of respiratory protective equipment for the OCNCS ISFSI.

RAI-7

Requirement:

- 10 CFR 50.47(b)(15), requires radiological emergency response training is provided to those who may be called on to assist in an emergency.
- 10 CFR Part 50, Appendix E.IV.F.1 requires description of specialized initial training and periodic retraining of categories of emergency personnel, including first aid and rescue teams.
- Associated guidance in NUREG-0654, Section II.B, Evaluation Criterion O.3, as modified by Attachment 1 to NSIR/DPR-ISG-02, "Emergency Planning Exemption Requests for Decommissioning Nuclear Power Plants" (ADAMS Accession No. ML14106A057), states that each licensee shall arrange for transporting victims of radiological accidents to medical facilities.

Issue: Section 19.1.2, "First Aid Personnel," of Enclosure 1 Attachment 1, states,

First Aid training is provided to personnel assigned on-shift in accordance with site training and qualification plan.

However, previously Section 11.2.2, "Emergency Response Organization Training," of Attachment 3, in letter dated February 13, 2018 (ADAMS Accession No. ML18044A214), states,

Personnel assigned the responsibility of first aid response will be trained with courses equivalent to Red Cross First Aid, CPR, or AED for Lay Responders or equivalent.

The current text of Section 19.1.2 "First Aid Personnel" does not provide information on the level of training provided.

Request: Clarify what level/type of training first aid personnel receive at the OCNGS ISFSI.

RAI-8

Requirement:

- 10 CFR 50.47(b)(16), as exempted, requires that responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.
- Associated guidance in NUREG-0654, Section II.P, Evaluation Criterion P.7, states each plan shall contain a 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.

Issue: The IOEP includes an Appendix B, which has a column to identify appropriate procedures. However, the column only indicates TBD for all procedures.

Request: Provide an appropriate listing, by title, of the procedures required to implement the IOEP for the OCNGS ISFSI.

RAI-9

Requirement:

- 10 CFR 50.47(b)(4), as exempted, requires a standard emergency classification and action level scheme.
- 10 CFR Part 50, Appendix E.IV.B.1, as exempted, requires a description of the means to be used for determining the magnitude of, and for continually assessing the impact of, the release of radioactive materials shall be described, including emergency action levels that are to be used as criteria for determining the need for notification.
- Associated guidance in NUREG-0654, Section II.D, Evaluation Criterion D.1, states that an emergency classification and emergency action level scheme must be established by the licensee.

Issue: PD-HA1, "Hostile Action is occurring or has occurred," of Enclosure 1, Attachment 2, "EAL Bases," states,

This IC [Initiating Condition] addresses the notification of an aircraft attack threat or an occurrence of a HOSTILE ACTION within the OWNER CONTROLLED AREA.

However, the EAL itself does not state the location in the Emergency Action Level.

Request: Revise the Emergency Action Level to include the location discussed in Enclosure 1, Attachment 2, "EAL Bases".

RAI-10

Requirement:

- 10 CFR 50.47(b)(4), as exempted, requires a standard emergency classification and action level scheme.
- 10 CFR Part 50, Appendix E.IV.B.1, as exempted, requires a description of the means to be used for determining the magnitude of, and for continually assessing the impact of, the release of radioactive materials shall be described, including emergency action levels that are to be used as criteria for determining the need for notification.
- Associated guidance in NUREG-0654, Section II.B, Evaluation Criterion D.1, states that an emergency classification and emergency action level scheme must be established by the licensee.

Issue: Definitions section," of Enclosure 1 Attachment 2, "EAL Bases," does not have a definition for the following terms:

- Emergency Action Level (EAL)
- Emergency Classification Level (ECL)
- Initiating Condition (IC)

Request: Revise the definition section to include the definitions for Emergency Action Level (EAL), Emergency Classification Level (ECL), and Initiating Condition (IC).

RAI-11

Requirement:

- 10 CFR 50.47(b)(4), as exempted, requires a standard emergency classification and action level scheme.
- 10 CFR Part 50, Appendix E.IV.B.1, as exempted, requires a description of the means to be used for determining the magnitude of, and for continually assessing the impact of, the release of radioactive materials shall be described, including emergency action levels that are to be used as criteria for determining the need for notification.
- Associated guidance in NUREG-0654, Section II.B, Evaluation Criterion D.1, states that an emergency classification and emergency action level scheme must be established by the licensee.

Issue: The Definitions section of Enclosure 1 Attachment 2, "EAL Bases," has the following terms that are not used in the EAL Bases:

- Normal Level
- Unplanned

Request: Revise the Definitions section to exclude the definitions for Normal Level and Unplanned.