

NMP3NPP IMPACT TO NMPNS AND JAF EMERGENCY PREPAREDNESS PROGRAM EVALUATION

1. PURPOSE

The purpose of this document is to evaluate whether the construction and operation of a new reactor, designated as Nine Mile Point 3 Nuclear Power Plant (NMP3NPP) next to the Nine Mile Point Nuclear Station (NMPNS) Units 1 & 2 and J. A. FitzPatrick (JAF) adversely impacts and affects the implemented NMPNS and JAF Emergency Preparedness Programs.

Specifically, it addresses items listed in Regulatory Guide 1.206, Section C.I.13.3.2, Emergency Plan Considerations for Multi-unit Sites.

2. STATEMENT OF INTENT

Constellation Nuclear Energy Group, LLC and UniStar Nuclear Operating Services, LLC propose to construct a U.S. Evolutionary Power Reactor (U.S. EPR) to be designated as NMP3NPP. There will be three separate emergency plans for the site; one for NMPNS Units 1 & 2 (the existing NMPNS Emergency Plan), one for JAF (the existing JAF Emergency Plan) and one for NMP3NPP. Combining the NMPNS and NMP3NPP emergency plans will be considered at a later date following the licensing of NMP3NPP and will be accomplished through the 10 CFR 50.54(q) evaluation process. There will be no sharing of personnel in the respective Emergency Response Organizations (EROs). The Emergency Operations Facility (EOF), Joint Information Center (JIC), Near Site Assembly Area and the Alert and Notification System (ANS) will be shared by all units.

3. MULTI-UNIT SITE CONSIDERATIONS

Note: Responses to the items cited in the Regulatory Guide are provided below each item.

Regulatory Guide 1.206, Section C.I.13.3.2 states:

If the new reactor is located on, or near, an operating reactor site with an existing emergency plan (i.e., multi-unit site), and the emergency plan for the new reactor includes various elements of the existing plan, the application should do the following:

- (1) Address the extent to which the existing site's emergency plan is credited for the new unit(s), including how the existing plan would be able to adequately accommodate an expansion to include one or more additional reactors and include any required modification of the existing emergency plan for staffing, training, emergency action levels, and the like.**

The NMPNS Units 1 & 2 and JAF emergency plans do not take credit for any NMP3NPP equipment or personnel resources with regard to providing support to the existing program.

The NMP3NPP emergency plan will have a separate ERO, separate EP staff, separate training program, separate Emergency Action Levels (EALs), separate equipment and separate TSC/OSC.

All units will share the EOF, JIC, Near Site Assembly Area and Alert and Notification System (ANS). There will be a limited sharing of equipment in the EOF, JIC, and Near Site Assembly Area. This will require modification to the existing units' emergency plans to reflect shared resources and will be evaluated by EP staffs for programmatic impact using the 10 CFR 50.54(q) evaluation process.

Sharing the EOF and JIC is desired to accommodate the response of offsite authorities to a single location for an event at the site.

A human factors evaluation will be performed to ensure the shared systems used for event assessment are appropriately designed to distinguish between units and are appropriate to accommodate multiple EROs.

A task analysis will be performed to ensure communications, accommodations and administrative resources in the EOF, JIC and near site assembly area are appropriately laid out to support NMP3NPP response requirements and address any impact to the existing units' emergency plans.

Facility layout and furnishings will be evaluated and modified to the extent necessary to allow for combined use if concurrent events are declared at all units and activation of multiple EROs is required.

Procedures will be developed for all EROs to address coordination of the flow of information during events involving multiple EROs.

A drill requiring mobilization and response activities of all EROs will be conducted prior to operation of NMP3NPP to demonstrate the ability of all utility emergency facilities to support a concurrent event. This drill will evaluate the adequacy of space, furnishing, communications, monitoring systems and shared resources to ensure response functions for all units are not degraded (in capability or timeliness) when responding to a concurrent event.

Shared use of the ANS does not impact the existing units' emergency plans. The ANS applies to the EPZ based on the highest event declared at the site and is operated by offsite agencies.

- (2) Include a review of the proposed extension of the existing site's emergency plan pursuant to 10 CFR 50.54(q), to ensure that the addition of a new reactor(s) would not decrease the effectiveness of the existing plans and the plans, as changed, would continue to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50.**

See Sections 4 and 5 of this evaluation.

(3) Describe any required updates to existing emergency facilities and equipment, including the alert notification system.

All units will share the EOF, JIC, Near Site Assembly Area and Alert and Notification System (ANS). This will require modification to the existing units' emergency plans to reflect shared resources.

A human factors evaluation will be performed to ensure the shared systems used for event assessment are appropriately designed to distinguish between units and are appropriate to accommodate multiple EROs.

A task analysis will be performed to ensure communications, accommodations and administrative resources in the EOF, JIC and near site assembly area are appropriately laid out to support NMP3NPP response requirements and address any impact to the existing units emergency plans.

Facility layout and furnishings will be evaluated and modified to the extent necessary to allow for combined use if concurrent events are declared at all units and activation of multiple EROs is required.

Procedures will be developed for all EROs to address coordination of the flow of information during events involving multiple EROs.

A drill requiring mobilization and response activities of all EROs will be conducted prior to operation of NMP3NPP to demonstrate the ability of all utility emergency facilities to support a concurrent event. This drill will evaluate the adequacy of space, furnishing, communications, monitoring systems and shared resources to ensure response functions for all units are not degraded (in capability or timeliness) when responding to a concurrent event.

Siting of NMP3NPP will not require modification of the Emergency Planning Zone (EPZ), therefore no changes to the ANS are necessary. The previous 12 months data for the combined NMPNS Units 1 & 2 and JAF NRC ANS Reliability Performance Indicator will be reviewed to ensure system performance is sufficient for NMP3NPP prior to initial loading of fuel.

(4) Incorporate any required changes to the existing onsite and offsite emergency response arrangements and capabilities with state and local authorities or private organizations.

No changes to the existing units' onsite emergency response arrangements or capabilities have been identified concerning the state and local or private organizations.

No changes to the existing state and local offsite emergency response arrangements or capabilities have been identified concerning private organizations.

Changes to the existing state and local offsite emergency response arrangements will be necessary to account for NMP3NPP liaisons sent to the offsite agency EOCs in support of an event.

Initial discussions for the construction of NMP3NPP have been conducted with state and local authorities. As a result of these discussions, agreement letters were obtained from both state and local authorities with emergency planning responsibilities indicating a commitment to participate in further development of the emergency response plans for NMP3NPP, including any required training and field demonstrations, and working with the licensee to identify any needed changes to their current commitment to execute their responsibilities.

(5) Justify the applicability of the existing 10-mile plume exposure EPZ and 50-mile ingestion control EPZ.

The offsite radiological consequences for the NMP3NPP design basis accident are below those of the existing units' design basis accident.

The limiting dose at the 10 Mile EPZ boundary for NMP3NPP, based on the worst case design basis accident, is <0.90 Rem TEDE based on AREVA calculation 32-9015342-006. Although this would provide a technically valid argument for a reduction of the 10 and 50 mile EPZ dose based requirements were the NMP3NPP sited alone, operation of the existing units will require maintaining the EPZs as currently established. As such, the existing 10 and 50 mile EPZs will be maintained for NMP3NPP.

(6) Address the applicability of the existing ETE or provide a revised ETE, if appropriate.

The current ETE study report conducted for the site, "Nine Mile Point/JA Fitzpatrick Nuclear Facility Development of Evacuation Time Estimates", Revision 0, dated August, 2003 is sufficient for the operation of NMP3NPP.

Additionally, a special site evacuation scenario, "Nine Mile Point Nuclear Station Development of Evacuation Time Estimates Future Year Construction Annex", Revision 0, dated August 2008 considering the NMP3NPP construction workforce was developed to determine the potential impact on the existing ETEs that could occur prior to NMP3NPP construction.

(7) If applicable, address the exercise requirements for co-located licensees, in accordance with Section IV.F.2.c of Appendix E to 10 CFR Part 50, and the conduct of EP activities and interactions discussed in RG 1.101.

Currently JAF and NMPNS Units 1 & 2 emergency plans include discussion that the offsite plans specify a FEMA evaluated full participation exercise for the site be performed.

To meet the intent of Regulation Guide 1.101, allowing offsite agencies to participate at a site exercise once every 2 years, the NMPNS Units 1 & 2 and JAF emergency plans will require modification.

The emergency plans will be modified to require participation by each licensee to:

(1) Conduct an exercise biennially of its onsite emergency plan; and

(2) Participate once every six years in an offsite biennial full or partial participation exercise;

All units participate in emergency preparedness activities and interaction with offsite authorities during the period between exercises. Each unit's emergency plan administrative procedures will be written to complement one another regarding the coordination and scheduling of the exercise schedule for the multi-licensee site.

(8) If applicable, include ITAAC which will address any changes to the existing emergency plans, facilities and equipment, and programs that are to be implemented, along with a proposed schedule.

The NMP3NPP emergency plan will have a separate ERO, separate EP staff, separate training program, separate Emergency Action Levels (EALs), separate equipment and separate TSC/OSC.

All units will share the EOF, JIC, Near Site Assembly Area and Alert and Notification System (ANS). There will be a limited sharing of equipment in the EOF, JIC, and Near Site Assembly Area. This will require modification to the existing units' emergency plans to reflect shared resources and will be evaluated by EP staffs for programmatic impact using the 10 CFR 50.54(q) evaluation process.

A drill requiring mobilization and response activities of all EROs will be conducted prior to operation of NMP3NPP to demonstrate the ability of all utility emergency facilities to support a concurrent event. This drill will evaluate the adequacy of space, furnishing, communications, monitoring systems and shared resources to ensure response functions for all units are not degraded (in capability or timeliness) when responding to a concurrent event.

An addendum to the existing units' emergency plans will be developed and implemented prior to the start of NMP3NPP construction to address temporary site impacts due to the presence of additional equipment, materials and personnel within the OCA during the construction phase. These addendums will be reviewed and approved using the 10 CFR 50.54(q) evaluation process.

Following construction and prior to operational testing, the addendum will be reviewed, evaluated, and retired. Prior to retiring the document, the existing units' emergency plans will be reviewed to address any permanent impact from the limited sharing of resources and operational logistics that are planned to occur when the new unit is licensed for operation.

No ITAAC is necessary to address construction phase changes to the existing units' emergency plans.

(9) Describe how emergency plans, to include security, are integrated and coordinated with emergency plans of adjacent sites.

The NMP3NPP emergency plan assigns the Emergency Preparedness Manager the responsibility to coordinate with the other units Emergency Preparedness Staff to ensure:

- *Consistency in planning with offsite authorities.*
- *Consistency in providing emergency preparedness information to the public.*
- *Operations and maintenance of shared emergency plan equipment and facilities.*
- *Site wide protective actions (notifications, assembly, evacuation, etc) including Security's actions.*
- *Proper scheduling of full participation exercises.*

A letter of agreement between the licensees outlining these shared responsibilities will be executed prior to pre-operational testing of NMP3NPP.

4. PRELIMINARY 10 CFR 50.54(Q) EVALUATION

The preliminary evaluation analyzed the impact of NMP3NPP construction and operation on the following planning standards implemented at the existing units by answering the question: Does the plan for the construction and operation of NMP3NPP or the NMP3NPP emergency plan impact any of the following?

Yes No

1. [50.47(b)(1)] Primary responsibilities of site, offsite agencies or support organizations.

OR

The ability to respond initially or on a continuous basis.

Comments: The NMPNS Units 1 & 2 and JAF EROs, offsite agency response organizations or support organization responders primary responsibilities are not impacted. Since no changes are being made to the capability or timeliness of the responder's functions/responsibilities, this item will not be impacted by NMP3NPP.

From a staffing perspective, existing units' personnel are not used for the NMP3NPP ERO and therefore the ability to respond initially or on a continuous basis will not be impacted by NMP3NPP.

Offsite agency personnel located in the EOF and JIC are not impacted as the facilities are to be shared by all three licensees.

Support organization (such as law enforcement, fire and medical) function under an all hazards plan that utilizes the National Incident Management System (NIMS) process for unified and forward command processes, and therefore the ability to respond initially or on a continuous basis will not be impacted by NMP3NPP.

2. [50.47(b)(2)] The assignment of responsibilities of personnel.

OR

Minimum staffing or timely augmentation.

OR

The interface between onsite and offsite support response activities.

Comments: An additional responsibility for existing units' onshift personnel is needed to ensure NMP3NPP personnel are notified of an event at their respective units.

The number of existing unit personnel needed for minimum staffing will not be impacted by NMP3NPP. However, timely augmentation of existing units' ERO

personnel may be potentially impacted if there is a concurrent or ongoing NMP3NPP event. Emergency plan procedures will be reviewed for entry into the Owner Controlled Area (OCA) by ERO personnel.

The existing units' interface with support organizations (such as law enforcement, fire and medical) will not be impacted by NMP3NPP.

Yes No

3. [50.47(b)(3)] Arrangements for requesting and effectively using assistance or resources from offsite authorities.

OR

The accommodations for federal, state, and/or local staff at the EOF.

Comments: The current arrangements in place for existing units to request and effectively use assistance or resources from offsite authorities will not be impacted by NMP3NPP. The scope of resources used is based primarily on offsite actions such as public notification, evacuation and monitoring and therefore do not change with the addition of NMP3NPP to the site. Arrangements involving the need for law enforcement, fire or medical support will not be impacted by NMP3NPP.

Although no impacts on arrangement for requesting and effectively using assistance or resources from offsite authorities have been identified at this time, planning efforts for NMP3NPP include agreement letters from the same existing units' state and local offsite authorities indicating their commitment to work with UniStar Nuclear to identify any needed changes to the current arrangements with the site as the process continues.

The accommodations for offsite agencies in the EOF have been taken into consideration if an event is declared at the existing units and NMP3NPP, with the need to activate all EROs. A combined drill involving activation of all EROs will be conducted prior to NMP3NPP operation to ensure the adequacy of emergency facilities to support concurrent events. The drill will evaluate the adequacy of space, furnishing, communications and monitoring systems and coordination of shared resources. This will also be used to verify that there would be sufficient space and resources for local agency and federal staff at the shared facility or facilities.

4. [50.47(b)(4)] Emergency Action Levels.

Comments: No changes to the existing units' EALs are required due to the addition of NMP3NPP.

5. [50.47(b)(5)] Notification procedures to either the ERO, local, state, or federal entities.

OR

The content of initial and follow-up messages.

Comments: A requirement to notify NMP3NPP of an event at existing units will be added to the existing units' emergency plan. The existing units and NMP3NPP EP staff will work with the state and locals on the inclusion of NMP3NPP in both the initial or follow-up information forms.

Yes No

6. [50.47(b)(6)] Communications capability among principal response organizations to emergency personnel or the public.

Comments: Current existing units' communications capability among principal response organizations to emergency personnel or the public will not change. The NMP3NPP emergency plan will have a separate ERO and separate equipment thus not requiring any modifications to the existing units' emergency plans.

7. [50.47(b)(7)] Dissemination of coordinated information to the general or transient public including periodic information dissemination (brochures).

Comments: The dissemination of emergency planning information to the public will be coordinated between all units to avoid duplicate efforts. This information will be updated to reflect the addition of NMP3NPP prior to full power operation.

8. [50.47(b)(8)] Provisions for or maintenance of emergency facilities and equipment.

OR

The periodicity of communications and emergency equipment tests.

Comments: Sharing of the EOF, JIC, Near Site Assembly Area and ANS will require coordination of administrative procedures for maintenance and testing of those facilities and equipment. This will ensure that tests are conducted at required periodicities but not unnecessarily duplicated.

9. [50.47(b)(9)] Methods, systems and/or equipment for the assessment and monitoring of actual or potential offsite radiological consequences.

Comments: NMP3NPP will utilize its own instrumentation, equipment, field monitoring teams and dose assessment program; therefore the existing units' program will not be affected.

10. [50.47(b)(10)] Protective Actions developed for either the Plume or Ingestion Exposure Pathways including onsite protective actions.

Comments: Onsite evacuation routes and assembly areas will be evaluated to ensure construction and/or operation of NMP3NPP does not reduce the level of safety for plant workers. Protective Action Recommendations to offsite authorities will be consistent from all units.

Yes No

11. [50.47(b)(11)] Means for controlling emergency worker radiation exposures consistent with the guidelines established by the EPA.

Comments: The existing units' current means for controlling emergency worker radiation exposures are not impacted by NMP3NPP. NMP3NPP will have separate procedures and equipment for controlling emergency worker radiation exposures thus not requiring any modifications to the existing units' emergency plans and procedures.

12. [50.47(b)(12)] Arrangements for medical services for contaminated injured individuals.

Comments: The existing units' current arrangements with medical services will not be impacted by NMP3NPP. NMP3NPP has obtained agreement letters from the same medical services for contaminated individuals indicating their commitment to participate in any further development of the emergency response plans and to work with Constellation Nuclear Energy Group, LLC and UniStar Nuclear Operating Services, LLC to identify any needed changes to the current Letter of Agreement with the site if applicable.

13. [50.47(b)(13)] Plans for plant reentry and/or recovery organization operations.

Comments: The NMP3NPP emergency plan will have a separate plant reentry and recovery organization. However, while the organization will not change, NMPNS Units 1 & 2 and JAF reentry and recovery plans will be revised to reflect additional considerations as a result of NMP3NPP; such as how NMP3NPP personnel may reenter the site to continue unit operations.

14. [50.47(b)(14)] Periodicity of drills and/or exercises as well as deficiency resolution.

Comments: Required changes to the existing units' emergency plans due to the addition of NMP3NPP will be made to exercise requirements. 10 CFR Part 50 Appendix E Section IV.F.2.c addresses exercise requirements for multi units at a single location with dual-licensees, however its intent is to alleviate the burden on the state and local agencies of participating in exercises more than once every two years. As such, the requirement will be modified to state that the state and local agencies will participate with each licensee once every six years.

15. [50.47(b)(15)] Training requirements for ERO or local site support personnel.

Comments: Current training requirements for the existing units' ERO are not impacted as NMP3NPP will have a separate ERO and training program.

Training of local support personnel will be coordinated between units to avoid duplicate training. NMP3NPP has obtained agreement letters from the same state and local support agencies indicating their commitment to participate in any required training and field demonstrations.

Yes No

16. [50.47(b)(16)] Responsibilities for Emergency Plan development, maintenance, and review as well as training requirements for personnel maintaining the plan.

Comments: The existing units' current responsibilities for emergency plan development, maintenance, and review as well as training requirements for personnel maintaining the plan will not be impacted as the NMP3NPP emergency plan will have a separate EP staff with separate training requirements.

17. Implementation of other federal regulations (primarily Appendix E to 10 CFR Part 50) and requirements or formal commitments related to the existing site Emergency Preparedness Programs.

Comments: 10 CFR Part 50 Appendix E Section IV.E.8 of states the licensee shall include: "A licensee onsite technical support center and a licensee near-site emergency operations facility from which effective direction can be given and effective control can be exercised during an emergency."

All units at the site will share a single EOF. This will affect the existing units' emergency response if an event is declared for NMP3NPP at the same time.

A human factors evaluation will be performed to ensure the shared systems used for event assessment are appropriately designed.

Facility layout and furnishings will be evaluated and modified to the extent necessary to allow for combined use if concurrent events are declared at multiple units and activation of all EROs is required.

A drill requiring mobilization and response activities of all EROs will be conducted prior to operation of NMP3NPP to demonstrate the ability of all utility emergency facilities to support a concurrent event. This drill will evaluate the adequacy of space, furnishing, communications, monitoring systems and shared resources to ensure response functions for all units are not degraded (in capability or timeliness) when responding to a concurrent event.

5. DETAILED 10 CFR 50.54(Q) EVALUATION

Further discussion of any planning standard marked as “yes’ in section 3.

- PLANNING STANDARD #2

The impact on Planning Standard **#2** is classified as a difference. Communication between each unit’s control rooms would need to be established for notification and information dissemination should an event occur at any unit. A requirement to notify NMP3NPP of an event at the existing units will be added to the existing units’ emergency plans. The existing units’ emergency plan procedures will be revised to ensure NMP3NPP control room personnel are notified of a declaration of an event. This will not reduce the effectiveness of the existing units’ emergency plan efforts as it does not change commitments to current requirements and does not reduce any ERO capabilities. The addition to notify NMP3NPP will not negatively impact the control room staff or delay the completion of currently assigned operations and emergency plan tasks.

The timely augmentation of the existing units’ ERO may be potentially impacted in the unlikely event of a concurrent or ongoing NMP3NPP event. Existing units’ ERO personnel responding to the event may be slowed at the OCA main entrance due to the processing of NMP3NPP personnel. Therefore, the existing units’ emergency plan procedures will be reviewed and evaluated for potential entry impediments into the OCA by ERO personnel to ensure there is no decrease in existing units’ program effectiveness.

- PLANNING STANDARD #3

The impact on Planning Standard **#3** for accommodations for federal, state and/or local staff at the EOF would be a difference only if all EROs are activated and the event is classified at a Site Area Emergency or higher (full response by offsite agencies). Emergency plan procedures will be modified to address joint activation of the shared facilities. Some modification (additional furniture, communications systems etc.) to the shared facilities will be performed to maintain current capabilities and effectiveness. These modifications will be based upon the performance results of the human factors evaluation on the shared systems used for event assessment at the EOF and the task analysis on communications, accommodations and administrative resources in the EOF, JIC and near site assembly area.

A combined drill requiring mobilization and response activities of the existing units’ and NMP3NPP EROs will be conducted prior to operation of NMP3NPP to ensure the adequacy of all utility emergency facilities to support concurrent events for all units. The drill will evaluate the adequacy of space, furnishing, communications, monitoring systems and coordination of shared resources to ensure response functions for either unit are not a decrease in program effectiveness.

- PLANNING STANDARD #5

The impact on Planning Standard **#5** is classified as a difference. Communication between each unit's control rooms would need to be established for notification and information dissemination should an event occur at either unit. A requirement to notify NMP3NPP of an event at existing units will be added to the existing units' emergency plan. The existing units' emergency plan procedures will be revised to ensure NMP3NPP control room personnel are notified of a declaration of an event occurring at the existing units. This will not reduce the effectiveness of the existing units' response efforts as it does not change commitments to current requirements and does not reduce any ERO capabilities. The additional notification to NMP3NPP will not negatively impact the control room staff or delay the completion of currently assigned operations and emergency plan tasks.

The format and content of notification forms will change only in that it will need to include a designator position for an emergency at NMP3NPP. The existing units and NMP3NPP EP staffs will work with the state and local planners to determine how best to add NMP3NPP to the notification forms.

- PLANNING STANDARD #7

The impact on Planning Standard **#7** does not affect the ability to respond to an emergency. The impact is on the provision of emergency preparedness information to the general public (prior to an actual emergency being declared) in a consistent manner. This will be addressed in the emergency preparedness administrative procedures providing for the coordination of efforts to ensure appropriate information is generated and routinely disseminated. This coordinated effort will ensure there is no decrease in effectiveness of planning efforts.

- PLANNING STANDARD #8

The impact on Planning Standard **#8** is a difference and will be addressed in the emergency preparedness administrative procedures providing for the coordination of efforts of all units' EP staff to ensure all shared facilities, are properly maintained. This coordinated effort will ensure there is no decrease in the current effectiveness of planning efforts.

- PLANNING STANDARD #10

The impact on Planning Standard **#10** would be a deviation. Onsite evacuation routes and assembly areas will be evaluated to ensure construction and/or operation of NMP3NPP does not reduce the level of safety for plant workers. During the construction phase of NMP3NPP, the existing units' Security Plans will incorporate NEI 03-12, Appendix E, "Additional Security Measures for Operating Reactors during Construction of New Reactor Plants within the Owner Controlled Area" through the 10 CFR 50.54(p) process. Section 2.6 of Appendix

E addresses evacuation routes for existing units remaining open during the construction phase of NMP3NPP. As such, primary and secondary egress capabilities will be maintained to ensure the health and safety of site personnel. This change is considered an improvement as it formalizes the emergency planning process previously informally addressed for large outages at the existing units.

- PLANNING STANDARD #13

For Planning Standard #13, additional considerations by the existing units' recovery organization concerning the presence of NMP3NPP would need to be reflected in the existing units' recovery plans and is considered a difference. The potential impact to the continued safe operation and maintenance of NMP3NPP, from reentry and recovery planning following a declared emergency another site unit will have to be considered on an event by event basis. Should an event occur at an existing unit that does not adversely impact NMP3NPP operations, at a minimum the continued operation of NMP3NPP, including access to the site, would need to be considered. These additional considerations will be added to the existing units' recovery plans and procedures to ensure there is no decrease in existing units' program effectiveness.

- PLANNING STANDARD #14

The impact on Planning Standard #14 would be a deviation. The exercise requirements for existing units may be changed to meet the intent of regulations. A second footnote to 10 CFR Part 50 Appendix E paragraph IV.F.2.c states:

Co-located licensees are two different licensees whose licensed facilities are located either on the same site or on adjacent, contiguous sites, and that share most of the following emergency planning and siting elements:

- (a) plume exposure and ingestion emergency planning zones,*
- (b) offsite governmental authorities,*
- (c) offsite emergency response organizations,*
- (d) public notification system, and/or*
- (e) emergency facilities.*

Regulatory Guide 1.101 states:

This regulatory guide provides guidance to co-located licensees and co-located applicants on methods that the staff of the U.S. Nuclear Regulatory Commission (NRC) considers acceptable for complying with the agency's regulations for emergency response plans and preparedness relative to conducting emergency response planning activities and interactions (A&I) in the years between participation in the offsite full or partial participation exercises with offsite authorities. This regulatory guide does not impose any new positions or requirements. Licensees and applicants are not required to

use the methods specified in the regulatory position set forth in this guide, and are free to propose other means to achieve compliance with the applicable regulations.

Since the intent of RG 1.101 is to alleviate the burden of participating in exercises more than once every two years on state and local agencies, the change to modify exercise requirements such that state and local agencies participate with each licensee once every six years is appropriate.

- PLANNING STANDARD #15

The impact on Planning Standard **#15** is a difference. The responsibility for training offsite groups that support the Emergency Preparedness Program will be shared by all units and will be addressed in emergency preparedness administrative procedures to coordinate the required training of offsite support personnel. This coordinated effort will ensure there is no decrease in effectiveness of the current offsite support personnel training program elements.

Additionally, existing units' EROs personnel will be trained on the requirement to notify NMP3NPP personnel of a classified event at their respective unit as well as the potential impact of the NMP3NPP ERO with respect to shared facility space during co-declared events. This added training will not reduce the effectiveness of the existing units' emergency planning training programs.

- PLANNING STANDARD #17

The impact on Planning Standard **#17** for accommodations for federal, state and/or local staff at the EOF would be a difference only if all EROs are activated and the event is classified at a Site Area Emergency or higher (full response by offsite agencies). Emergency plan procedures will be modified to address joint activation of the shared facilities. Some modification (additional furniture, communications systems etc.) to the shared facilities will be performed to maintain current capabilities and effectiveness. These modifications will be based upon the performance results of the human factors evaluation on the shared systems used for event assessment at the EOF and the task analysis on communications, accommodations and administrative resources in the EOF, JIC and near site assembly area.

A combined drill requiring mobilization and response activities of the existing units' and NMP3NPP EROs will be conducted prior to operation of NMP3NPP to ensure the adequacy of all utility emergency facilities to support concurrent events for all units. The drill will evaluate the adequacy of space, furnishing, communications, monitoring systems and coordination of shared resources to ensure response functions for all units' are not a decrease in program effectiveness.

6. SUMMARY

Since there will be no sharing of personnel in the respective Emergency Response Organizations (EROs) and only the Emergency Operations Facility (EOF), Joint Information Center (JIC), Near Site Assembly Area and Alert and Notification System (ANS) will be shared by all units, the impact on existing units' emergency preparedness programs will be minimal.

Accommodations will be made for inter-unit notifications, limited sharing of facilities and equipment, onsite protective actions and coordination of interfacing program maintenance items (public information, offsite interfaces, maintenance of shared facilities, etc.).

These changes either individually or in total will not reduce the current effectiveness of the existing units' emergency plans.

Summary of Action Items

1. A human factors evaluation will be performed to ensure the shared systems used for event assessment are appropriately designed to distinguish NMP3NPP from the existing units.
2. A task analysis will be performed to ensure communications, accommodations and administrative resources in the EOF, JIC and near site assembly area are appropriately laid out to support NMP3NPP response requirements and address any impact to the existing units' emergency plans.
3. A drill requiring mobilization and response activities of all EROs will be conducted prior to operation of NMP3NPP to demonstrate the ability of all utility emergency facilities to support a concurrent event. This drill will evaluate the adequacy of space, furnishing, communications, monitoring systems and shared resources to ensure response functions for either unit are not degraded (in capability or timeliness) when responding to a concurrent event.
4. Existing units' and NMP3NPP emergency plan implementing procedures will be modified to address joint activation of the shared facilities.
5. The previous 12 months data for the existing units' NRC ANS Reliability Performance Indicator will be reviewed to ensure system performance is sufficient for NMP3NPP.
6. Changes to the existing state and local offsite emergency response arrangements will be necessary to account for NMP3NPP liaisons sent to the offsite agency EOCs in support of an event.
7. The existing units' and NMP3NPP emergency plan administrative procedures will be written to complement one another regarding the coordination and scheduling of the exercise schedule for the multi-licensee site.
8. An addendum to the existing units' emergency plan will be developed and implemented prior to the start of NMP3NPP construction to address temporary site impacts due to the presence of additional equipment, materials and personnel within the OCA during the construction phase. This addendum will be reviewed and approved using the 10 CFR 50.54(q) evaluation process.

Following construction and prior to operational testing, the addendum will be reviewed, evaluated, and retired. Prior to retiring the document, the existing units' emergency plan will be reviewed to address any permanent impact from the limited sharing of resources and operational logistics that are planned to occur when the new unit is licensed for operation.

9. Onsite evacuation routes and assembly areas will be evaluated to ensure construction and/or operation of the new unit does not reduce the level of safety for plant workers. The existing units' emergency plan procedures will be reviewed and evaluated for potential entry impediments into the OCA by ERO personnel to ensure there is no decrease in existing units' program effectiveness.
10. A letter of agreement between the licensees of the existing units and NMP3NPP outlining shared responsibilities will be executed.
11. Emergency plan procedures will be reviewed for entry into the Owner Controlled Area (OCA) by ERO personnel to address timely augmentation of the existing units' ERO personnel if there is a concurrent or ongoing NMP3NPP event.
12. A requirement to notify NMP3NPP of an event at the existing units will be added to the existing units' emergency plans. Emergency plan procedures will be revised to ensure NMP3NPP control room personnel are notified of a declaration of an event occurring at any existing unit.
13. The existing units and NMP3NPP emergency preparedness administrative procedures will provide for the coordination of efforts to ensure appropriate public information is generated and routinely disseminated.
14. The existing units and NMP3NPP emergency preparedness administrative procedures will provide for the coordination of efforts of all units EP staff to ensure all shared facilities are properly maintained.
15. Existing units' reentry and recovery plans will be revised to reflect additional considerations as a result of NMP3NPP.
16. The existing units and NMP3NPP emergency preparedness administrative procedures will provide for the coordination of required training of offsite support personnel.
17. The existing units' ERO personnel will be trained on the requirement to notify NMP3NPP personnel of a classified event at their respective unit, as well as the potential impact of NMP3NPP ERO with respect to shared facility space during events declared for more than one unit.
18. The existing units' and NMP3NPP EP staffs will work with the state and locals to determine how best to add NMP3NPP to both the initial and follow-up information.