

RAI Attachment

RAI Number	RAI Description	State/County
BLFNT - 001	<p>NUREG Criterion A.1.a:</p> <p>The Alabama EOP, Tab A and Figure 1, the Alabama REPP, Base Plan, and Sections IV.E and V.B, and Alabama REPP, Tab A, lists the primary organizations responsible for those ESFs considered being applicable to an incident at a nuclear power plant. The information provided in Alabama EOP and the REPP is not consistent for ESFs 1, 6, 7, 8, 10, 11 and 13.</p> <p>The proposed County plans did not completely identify the organizations that will be part of all ESF functions, particularly those potentially involved with receiving evacuees. The Jackson and DeKalb County Extension Service(s) are listed in the proposed Jackson and DeKalb County, Basic Plan, Section V, "Direction and Control," as having primary responsibility for ingestion pathway operations but are not listed in the proposed Jackson and DeKalb County, Basic Plan, Section IV.A, "County Response Agencies."</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Clarify the inconsistent information regarding the roles and responsibilities of those Agencies provided in Alabama EOP and the REPP for ESFs 1, 6, 7, 8, 10, 11 and 13. 2. The Jackson and DeKalb County organizations responsible for supporting all ESF functions. 3. Updated Jackson and DeKalb County Plan(s) with the organization and responsibilities of the Jackson and DeKalb County Extension Service. 4. The existing Emergency Operation Plan for Jackson and Dekalb Counties. 	<p><i>Alabama/ Jackson & Dekalb Counties</i></p>
BLFNT - 002	<p>NUREG Criterion A.1.c, A.1.b, A.1.c:</p> <p>Alabama EOP, Basic Plan, Tab B, "EOC Organization," provides an organizational chart of the State EOC, but this organizational chart does not include the interrelationships amongst all involved organizations, particularly local governments, private, and volunteer organizations. Also, Alabama REPP Base Plan Section IX.E, "Organizational Structure for All Organizations," states that DeKalb and Jackson Counties will be added.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. In the Alabama EOP, a block diagram/organizational chart illustrating interrelationships amongst all involved 	<p><i>Alabama / Jackson & Dekalb Counties</i></p>

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	<p>organizations, including state and local governments, private, and volunteer organizations involved in radiological emergency response.</p> <ol style="list-style-type: none"> 2. Organizational charts for Jackson and DeKalb Counties. 3. The existing Emergency Operation Plan for Jackson and Dekalb Counties, Alabama. 	
BLFNT - 003	<p>NUREG Criterion A.2.b:</p> <p>The County and local government Resolutions and Ordinances providing the authority to execute the Alabama REPP for DeKalb and Jackson Counties are not provided in the list of statutory references on Page 1 of the Alabama REPP.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. The County and local government Resolutions and Ordinances providing the authority to execute the AL REP Plan for Jackson and Dekalb Counties, which is missing from the list of statutory references in the AL REP Plan. 2. Please provide additional information that identifies, for the affected jurisdictions in Jackson County, the County Resolutions and local Ordinances necessary to provide legal authority to implement the plan. Also provide the content of the resolutions or ordinances. 3. The Resolutions and Ordinances in Jackson and DeKalb Counties that provide the authority to execute the County response plans. 	<i>Dekalb & Jackson Counties</i>
BLFNT - 004	<p>NUREG Criterion A.3, C.3, C.4, I.11, L.1, L.4, O.1.b (support from other organizations):</p> <p>The Alabama EOP provides a signature list to an overall Letter of Agreement; however the signature list is not dated. Many State organizations involved in response for BNP have signed this generic letter, but many more organizations are listed in the Alabama REPP and the proposed Appendix 3. Also, the proposed Jackson and DeKalb County plans do not reference or provide Letters of Agreement.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. A current, dated copy of the letter of agreement contained in the Alabama EOP, page iv. 2. Letters of agreement for the organizations identified below and 	<i>Alabama / Jackson & Dekalb Counties</i>

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	<p>any additional organizations that will support Alabama's response to an emergency at BNP. The following organizations are listed as having responsibilities as primary or support agencies in Tab A to the Alabama REPP but are not signatories to the Alabama EOP, and also have no letter of agreement reference in the Alabama REPP:</p> <ul style="list-style-type: none"> a. ACJIC b. Alabama Power Company c. Alabama Sheriff's Association d. Board of Funeral Services e. Board of Pardons and Paroles f. Civil Air Patrol g. Dept. of Forensic Sciences h. Emergency Alert System i. LPG Board j. Public Service Commission k. RACES/ARES l. Rural Electric Co-ops m. Tennessee Valley Authority <p>3. Letters of Agreement for the support organizations identified in the proposed Appendix 3 to the Alabama REPP:</p> <ul style="list-style-type: none"> a. American Red Cross, Salvation Army, and local volunteer organizations from which EWS will request and coordinate the support based on previous agreements. (Tasks and Responsibilities, ESF-6) b. Schools and Health Facilities in the 10-mile EPZ as listed in Attachment 3 of proposed Appendix 3. c. County EWS Officer letters of agreement to support the EWS effort that are provided to the State Department of Human Resources (DHR), EWS Coordinator for review. (Master Checklist Guide for ESF-6) d. Designated Hospital Administrators current letters of agreement with the State Health Officer coordinated by the County EMA Director. (Master Checklist Guide for ESF-8) e. Rescue current letter of agreement with the County EMA (Master Checklist Guide for ESF-8) <p>4. The proposed DeKalb County REPP and the proposed Jackson County REPP do not contain Letters of Agreement for non-County agencies or organizations identified in the respective proposed County's REP Basic Plan Sections IV and V, or for facilities identified in Annex I to the respective County REP Plan.</p> <ul style="list-style-type: none"> a. Letters of Agreement for organizations identified in the proposed DeKalb County REPP. 	

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BLNFT - 005	<p>b. Letters of Agreement for organizations identified in the proposed Jackson County REPP.</p> <p>NUREG Criterion A.1.d:</p> <p>Proposed Jackson and DeKalb County REPP, Basic Plan, Section IV, lists the respective County emergency response agencies. Section V, lists the County level emergency response organizations. In both Jackson and DeKalb County, several organizations are identified as primary agencies with responsibilities for direction and control, but are not listed as a County response agency in Section IV of the proposed County Plan or the Alabama REPP, Base Plan, Section IV.E.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. The individual in charge of emergency response for the DeKalb Council on Aging, the Amateur Radio Emergency Service and Extension Service. <p>The individual(s) in charge of emergency response for the Jackson County Amateur Radio Emergency Service and Extension Service.</p>	<p><i>Jackson and Dekalb Counties</i></p>
BLNFT - 006	<p>NUREG Criterion A.1.e:</p> <p>Rosters for notifying emergency response personnel were not included in the plans provided for review. In the proposed change to the Alabama REPP for BNP, placeholders are provided to add notification and communication charts for Jackson and DeKalb counties.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Clarify which organization represents "the SEOC," as described in Alabama REPP, Section X.B and proposed Section X.G. 2. For the State of Alabama, Jackson and DeKalb County, provide rosters of personnel supporting 24-hour emergency response. Rosters must include positions or titles, names, and contact information. 3. Notification diagrams and communication charts as described in the proposed Alabama REPP, Section X.G. 	<p><i>Alabama / Jackson and Dekalb Counties</i></p>
BLFNT - 007	<p>NUREG Criterion A.2.a:</p> <p>The proposed Alabama REPP, Appendix 3, Attachment 5, "Task Assignments," includes a matrix for both Jackson and DeKalb County that identifies the primary, support and coordinating agencies by ESF function. ESF #1, Transportation, has four agencies identified as the "primary" agency. Also in that matrix, no primary or support agencies</p>	<p><i>Jackson and Dekalb Counties</i></p>

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BLNFT - 008	<p>are identified for ESFs 3, 4, 9, 12 & 14.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Clarify who is the primary agency responsible for transportation (ESF #1) for Jackson and DeKalb counties. 2. Clarify the primary agency responsible for Jackson and DeKalb County's emergency response for ESFs 3, 4, 9, 12 & 14. <p>NUREG Criterion A.4:</p> <p>The proposed Jackson and DeKalb County plans do not specifically state who is responsible for maintaining emergency functions around the clock. Additionally, although the plans reference maintenance of rosters for 24-hour operation, rosters were not provided for review.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Personnel rosters that demonstrate the ability to maintain 24-hour emergency operations for the State of Alabama, and Jackson and DeKalb Counties (also see NUREG Criterion F.1.e and H.4). 2. The individual, by title, responsible for assuring continuity of operations for Jackson and DeKalb Counties. 	<p><i>Alabama – Jackson & DeKalb Counties</i></p>
BLFNT - 009	<p>NUREG Criterion C.1.b:</p> <p>The anticipated times of arrival for Federal resources responding to an incident at BNF were not included in the information provided for review.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Identify the expected arrival times for Federal resources responding to the Bellefonte Nuclear Plant. 	<p><i>Alabama</i></p>
BLFNT – 010	<p>NUREG Criterion C.1.c:</p> <p>The information provided for review does not address specific State and local resources available to support a Federal response to a nuclear incident at BNP or the existing NPPs in Alabama.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. The State and local resources available to support the Federal response to an incident at BNP, to include: <ol style="list-style-type: none"> a. Airfields; b. Command posts; 	<p><i>Alabama / Jackson and DeKalb Counties</i></p>

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BLNFT – 011	<p>c. Facilities made available to Federal response personnel and the location of those facilities;</p> <p>d. Communication equipment and protocols;</p> <p>e. Information and assistance local personnel will be able to provide regarding the unique aspects of the area.</p> <p>NUREG Criterion C.3, C.4, I.11, J.11 (support from other organizations):</p> <p>Please provide the following:</p> <ol style="list-style-type: none"> 1. The Southern Agreement for Mutual State Radiological Assistance. 2. A copy of the current Southern Mutual Radiological Assistance Plan. 	<i>Alabama / Jackson and Dekalb Counties</i>
BLNFT – 012	<p>NUREG Criterion C.3:</p> <p>The Alabama plans provided for review for the ADEM Environmental Laboratory did not include: the number of samples the lab can process in a given time period and the availability of the lab.</p> <p>For the EPA Eastern Radiological Laboratory the following information was not included: the number of samples the lab can process in a given time period the location of the lab and the availability of the lab.</p> <p>Please provide the following information: For the Alabama Department of Environmental Management</p> <ol style="list-style-type: none"> 1. Environmental Laboratory: <ol style="list-style-type: none"> a. The number of samples the lab can process in a given time period. b. The availability of the lab. 2. For the EPA Eastern Radiological Laboratory: <ol style="list-style-type: none"> a. The number of samples the lab can process in a given time period. b. The location of the lab. c. The availability of the lab. 	<i>Alabama</i>
BLNFT - 013	<p>NUREG Criterion C.4:</p> <p>Letters of agreement were not provided for review to demonstrate that facilities, organizations and individuals are committed to provide assistance as documented within a LOA. Letters of agreement for non-governmental organizations must include information relative to what services will be provided, what organizations will provide the service,</p>	<i>Alabama/Georgia</i>

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	<p>information on the location of resources to be provided, a 24-hour point of contact, radiological emergency response training, and signatures of the parties authorized to execute the letter of agreement.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. For non-governmental agencies identified in NUREG criterion A.3, provide letters of agreement with the following information: <ol style="list-style-type: none"> a. What services will be provided; b. What organizations will provide the service; c. Information on the location of resources to be provided; d. 24-hour point of contact; e. Radiological emergency response training; and f. Signatures of the parties authorized to execute the letter of agreement. <p>Please provide the following for the State of Georgia:</p> <ol style="list-style-type: none"> 1. State of Georgia certification letter committing the State of Georgia to support further development and implementation of the State of Georgia's Radiological Emergency Response Plan as it relates to the ingestion pathway activities associated with Bellefonte NPP. 2. State of Georgia certification letter committing the State of Georgia to support further development and implementation of the State of Georgia's Radiological Emergency Response Plan as it relates to the ingestion pathway activities associated with Bellefonte NPP. 	
BLFNT - 014	<p>NUREG Criterion D.4:</p> <p>At a General Emergency ECL, the Alabama EOP and REPP do not include the recommendation to immediately evacuate about 2 miles in all direction and 5 miles downwind from the plant, unless other conditions make evacuation dangerous.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Clarify how the State of Alabama implements the requirements of NUREG 0654, Supplement 3, and the recommendations of the licensee, with respect to protective actions at a General Emergency ECL (also see NUREG criterion J.9 and J.10.m). 	Alabama

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BLFNT - 015	<p>NUREG Criterion E.1:</p> <p>The information in the plans provided for review do not include detailed notification procedures at the county level. Also, the information on the 24-hour warning point location needs to be clarified.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Provide or reference procedures that the Jackson and DeKalb County EMAs will use to notify support organizations. Include the contact list, means of notification (e.g., commercial telephone), and message verification procedures. 2. Clarify the use of the State DPS 24-hour warning point versus the local 24-hour warning points. Amend the appropriate notification diagrams, as appropriate. 	<i>Jackson and Dekalb Counties</i>
BLFNT - 016	<p>NUREG Criterion E.2:</p> <p>The information provided for review does not include response organization contact lists or references to contact lists, or the means of contact.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Provide or reference emergency response personnel notification (call list) information for the State and county agencies specified in the ESFs. Include the means of contact (e.g., telephone, pager, radio). 	<i>Alabama/ Jackson and Dekalb Counties</i>
BLFNT - 017	<p>NUREG Criterion E.5:</p> <p>The plans provided for review do not contain information on the broadcast stations and systems participating in the EAS, the capacity of these stations to operate continuously, the formal agreements between organizations participating in disseminating public emergency messages, or any capacity for broadcasting directly from the EOC.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. List the broadcast stations participating in the EAS for the Bellefonte Site and provide certification for 24 hour operations of those stations. 2. List in the plan and provide copies of MOUs or LOAs from organizations participating in the dissemination of public emergency information. These agreements should specify the 	<i>Alabama / Jackson and Dekalb Counties</i>

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	<p>individual responsibilities of each organization and commitments to honor those responsibilities in the event of a radiological emergency. Refer to NUREG criterion A.3.</p> <ol style="list-style-type: none"> 3. Reference or include some form of documentation that reports the station's or broadcast system's ability to participate in the public notification process. 4. Identify (by title) 24/7 points of contact for participating radio stations. 5. Provide information regarding the capability for broadcasting emergency instructions directly from the EOC through radio and television stations, if this capability is available. 	
BLFNT - 018	<p>NUREG Criterion E.6:</p> <p>The information in the plans provided for review did not provide sufficient detail regarding alert and notification system activation procedures and the time required to implement them, include the 45 minute time limit for backup route alerting; the use of route alerting, the means for alerting special needs facilities, transients or residents in remote locations, alerting the hearing impaired, and siren design and testing.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Describe in detail or refer to existing procedures that describe the administrative and physical process of activating the alert and notification primary and backup systems. Specify the amount of time required to implement those procedures. 2. Clarify whether use of mobile alerting routes will be used for supplementary alert and notification or just backup route alerting. 3. Provide details of mobile alerting routes; specify the time required to alert the public, in the event of siren failure, using the mobile alerting routes. 4. Describe provisions for alerting the hearing-impaired. 5. Describe the means for notifying special needs facilities, transients and residents in remote locations. 6. Describe how the requirements for periodic siren testing will be met, as described in NUREG 0654, Appendix 3 and FEMA REP-10. 	<p><i>Alabama / Jackson and Dekalb Counties</i></p>

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BLFNT - 019	<p>NUREG Criterion E.7:</p> <p>The plans provided for review do not contain sufficient detail regarding broadcast intervals, the delivery format of messages, modifying pre-scripted messages, rumor control, or foreign language messages.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Describe the broadcast intervals appropriate to the different types of EAS messages and Special News Broadcasts and the arrangements with EAS stations to broadcast at those intervals. 2. Identify methods that may be used in the release of special news broadcasts, such as press releases read over the air, live interviews by station personnel with State or local government officials, or live or recorded messages from the State and/or local EOCs. Describe procedures for the use of these methods. 3. Clarify incomplete information that translates the area covered by PADs into equivalent ERPAs understandable to the public. 4. Describe the process for adapting EAS messages to account for and counter rumors or other inaccuracies that may have a negative impact on adherence by the public to instructions issued by authorities. 5. Provide data on the foreign languages spoken in the EPZ. If any of those languages are spoken by more than 5% of the voting-age population, provide translations of EAS messages and Special News Broadcasts in those languages. 	<i>Alabama</i>
BLFNT - 020	<p>NUREG Criterion F.2:</p> <p>The proposed plans for Jackson and DeKalb County do not specify the mechanism for EOC communication between EOCs and emergency medical service providers (primary and backup).</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Provide the primary and backup method for Jackson and DeKalb County EOCs to communicate with emergency medical service providers. 	<i>Alabama</i>

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BLFNT – 021	<p>NUREG Criterion F.3:</p> <p>Periodic testing for communication systems does not address pagers used for personnel notification, fax machines, auto dial equipment or computers used to store phone numbers.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Describe the periodic tests for systems that are infrequently used, such as: pagers used for personnel notification, fax machines, auto dial equipment and computers used to store phone numbers. 	<i>Jackson and Dekalb</i>
BLFNT – 022	<p>NUREG Criterion G.1:</p> <p>The information provided for review did not contain copies of public educational materials or specifics about the dissemination of the materials. The information also did not provide information to evaluate whether these materials must be translated into any other languages. An Ingestion Pathway Brochure, updated for BNP, was not provided.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Provide copies of all public information materials, including the brochure and TVA calendar cited in the plans. 2. Specify how the public information materials are disseminated. 3. Provide public information in applicable language if any foreign minority population of voting age exceed 5% of the county's population. 4. Provide an ingestion pathway brochure, updated for BNP. 	<i>Alabama / Jackson and Dekalb Counties</i>

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BLFNT – 023	<p>NUREG Criterion G.2:</p> <p>The plans provided for review do not provide specifics regarding radiological emergency information for transient populations in the 10-mile EPZ. The provided plans do not include a list of the locations where radiological emergency information directed at transient populations is posted, nor do they indicate the mechanism for annual audit, assessment, and update of such information. They also do not include copies or reproductions of postings, decals, etc.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. List locations where radiological emergency information directed at transient populations will be posted or otherwise made available, including the form of information at each location (decals, postings, brochures, etc.). 2. Describe the mechanism for annual updates of such information, including how they are assessed for currency and the means of replacement, if necessary. 3. Describe the method for auditing such information annually to determine whether the information is still there and still legible, and whether it needs to be replaced. 4. Provide copies or reproductions of all decals, postings, etc. The information should be consistent with the REP plans and should contain at minimum local EAS radio and television stations and a reference to a source of additional information, such as a brochure or phone book. 	<p><i>Alabama / Jackson and Dekalb Counties</i></p>
BLFNT – 024	<p>NUREG Criterion G.3.a:</p> <p>The information in the plans provided for review does not specify the method of contacting the TVA JIC, sufficiently describe provisions for county media briefing locations, or specify the capability of the State or county EMAs to answer media telephone inquiries.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Identify the method by which State and local organizations can contact the TVA JIC. 2. Provide locations for county media briefings and the logistical features (e.g., room sizes, office furniture and equipment if needed, parking, communications capabilities) of each. 3. Describe the capability of the State and county EMAs to answer media telephone inquiries. 	<p><i>Alabama / Jackson and Dekalb Counties</i></p>

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BLFNT – 025	<p>NUREG Criterion G.4.a:</p> <p>The information in the plans provided for review does not clearly identify who the spokespeople for State and county support agencies are, where they will be located, and how they will obtain and exchange information.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Specify the person (by title) who is the designated spokesperson for each State and county support agency, as applicable. 2. Specify where the designated spokespeople will be located during a radiological incident. If media interaction is planned for more than one location, a main spokesperson should be designated for each location. 3. Identify the physical means (e.g., telephone, fax, computer network) used for communication of information between the spokespeople and the EOC. 	<p><i>Alabama / Jackson and Dekalb Counties</i></p>
BLFNT – 026	<p>NUREG Criterion G.4.b:</p> <p>The procedures for exchanging information within the JIC and between spokespeople at other locations were not included in the plans provided for review.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Describe the procedures (e.g., regular conferences, circulation of press releases) to ensure exchange of information between organizational spokespeople at the JIC. 2. Describe the means and procedures in place to ensure rapid exchange of information between spokespeople at the JIC and State and county spokespeople at other locations. Include who (by title) is responsible for ensuring that the exchange takes place and what physical means (e.g., telephone, fax, computer network) will be used. 	<p><i>Alabama / Jackson and Dekalb Counties</i></p>
BLFNT – 027	<p>NUREG Criterion G.4.c:</p> <p>Procedures for activating and staffing a public inquiry program, descriptions of the physical capabilities for handling telephone calls, procedures for the staff to use in rumor control, and procedures for publicizing public and media inquiry telephone lines were not included in the plans provided for review.</p> <p>Please provide the following information:</p>	<p><i>Alabama / Jackson and Dekalb Counties</i></p>

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	<ol style="list-style-type: none"> 1. Describe the physical capability to receive and effectively respond to numerous simultaneous telephone calls from the general public, including telephones and staff at the State facility and any county facilities. 2. Specify at what point the public inquiry center will be activate and who (by title) is responsible for staffing and operation. 3. Describe the mechanism to provide the rumor control staff with current information. 4. Describe procedures for the public inquiry staff to implement rumor control. 5. Specify how public inquiry telephone numbers will be publicized (e.g., EAS or other media information), and how media inquiry telephone numbers will be publicized separately. 	
BLFNT – 028	<p>NUREG Criterion H.3:</p> <p>Incomplete information was provided to assess the adequacy of the primary and alternate Alabama EOC and the proposed Jackson and DeKalb County EOCs. No description of the provision for backup power for the State EOC was identified in the Alabama EOP or REPP plans. No description of the alternate EOC at Maxwell Air Force Base is provided that describes its location, layout, available facilities, size, and security arrangements. The proposed Jackson and DeKalb County plans describe security arrangement for the County EOCs, but no location or description for the County EOCs was identified in the proposed County or State Plans.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Provide information describing the location, layout, access control, and available facilities at the alternate State EOC. 2. Describe sources of backup power for all EOCs. 3. Provide information describing the location, layout, and available facilities for the proposed Jackson and DeKalb County EOCs. 	<i>Alabama / Jackson and Dekalb Counties</i>
BLFNT – 029	<p>NUREG Criterion H.4</p> <p>Plans provided for review do not specify for any facility, what conditions are required to declare the emergency facility operational (e.g. specific staffing requirements, physical set up of the facility, set up of communication links, etc).</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. The conditions to be met for a facility to be declared 	<i>Alabama / Jackson and Dekalb Counties</i>

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	<p>operational. This applies to all emergency response facilities, such as the Alabama EOC, the IFO or FEOC, proposed Jackson and DeKalb County EOCs, radiological monitoring and decontamination facilities, and mass care facilities.</p> <p>2. Provide staffing rosters for all emergency response facilities (see NUREG Criterion A.4 and F.1.e).</p>	
BLFNT – 030	<p>NUREG Criterion H.7:</p> <p>The State of Alabama, Radiological Field Monitoring Team Manual, Radiation Control, addresses offsite radiological monitoring equipment for both Brown’s Ferry and Farley NPP Field Monitoring Teams, but has not been updated to include BNP. The proposed Jackson and DeKalb county plans do not contain a detailed listing of the monitoring equipment stored in emergency trailers.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Identify the offsite radiological monitoring equipment (by equipment type and number) that is stored in the vicinity of the proposed BNP. Include the location of referenced equipment. 	<p><i>Alabama / Jackson and Dekalb Counties</i></p>

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BLFNT - 031	<p>NUREG Criterion H.10:</p> <p>Plans do not describe the provisions to inspect, inventory and operationally check emergency equipment/instruments at least once each calendar quarter and after each use. Information was not provided to ensure sufficient reserves of instruments/equipment to replace those which are removed from emergency kits for calibration or repair. Calibration of equipment at intervals recommended by the supplier of the equipment was not addressed in the supplied plans.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Describe the State and County plans to inspect, inventory and operationally check emergency equipment/instruments at least once each calendar quarter and after each use. 2. Describe the State and local plans for ensuring that sufficient reserves of instruments/equipment exist in order to replace those removed from emergency kits for calibration or repair. 3. Describe the State and local plans for ensuring equipment is calibrated at intervals recommended by the supplier of the equipment. 4. Provide the plan instructions for checking the dosimeters before operation, and for use and handling of the dosimeters. 	<p><i>Alabama / Jackson and Dekalb Counties</i></p>
BLFNT – 032	<p>NUREG Criterion H.11:</p> <p>Emergency kits by general category were not included in the State or County plans provided for review.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Provide information that, in an appendix, identifies emergency kits by general category (protective equipment, communications equipment, radiological monitoring equipment and emergency supplies. <p><i>Alabama needs to provide requested information for current inventory of equipment; future development by State and County for equipment to be used to support the Bellefonte Site.</i></p>	<p><i>Alabama / Jackson and Dekalb Counties</i></p>
BLFNT – 033	<p>NUREG Criterion H.12:</p> <p>The State of Alabama, Radiological Field Monitoring Team Manual, Radiation Control, has not been updated to include information regarding local coordination of radiological monitoring and sampling activities for BNP.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. The local (county) location for coordination of radiological 	<p><i>Alabama / Jackson and Dekalb Counties</i></p>

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	monitoring and sampling activities for the proposed BNP.	
BLFNT – 034	<p>NUREG Criterion I.7:</p> <p>The items listed below were not included in the information provided for review.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. The State and local resources available to support field monitoring including the number of field teams per shift. 2. An updated the Alabama Radiological Field Monitoring Team Manual to include radiological offsite monitoring for BNP. 	<i>Alabama</i>
BLFNT – 035	<p>NUREG Criterion I.8:</p> <p>The provided plans do not contain sufficient information to determine the capability of the teams to make rapid assessments of the radiological hazards through liquid or gaseous release pathways. The Alabama Radiological Emergency Plan and the proposed local plans are not complete with regards to the activation of the RFMT by a Public Health Official in the County Public Health Department.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. <u>Activation and Notification:</u> The plans provided for review are not complete with regards to the activation of the RFMT by a Public Health Official in the County Public Health Department or inclusion of the BNP into the Alabama Radiological Field Monitoring Team manual. <ol style="list-style-type: none"> a. Identify who the utility will contact (by title) within ESF # 8 to begin RMFT mobilization. b. Provide the designated individual (by title) who activates both State and local RMFTs c. Provide the means of communication (e.g., pager, telephone calls) for activation of the field teams. d. Provide the protocols for repeat attempts to reach those who do not initially respond. 2. <u>Field Team Composition and Deployment Times:</u> The plans provided for review are not complete with regards to the staging areas, number of teams and composition (driver, monitor and/or other) of the teams to be deployed for field monitoring and sampling. <ol style="list-style-type: none"> a. The location of the staging areas that will be used as the initial deployment point for the teams. 	<i>Alabama / Jackson and Dekalb Counties</i>

RAI Number	RAI Description	State/County
	<ul style="list-style-type: none"> b. The composition of the field teams. c. The number of teams that are potentially available in one hour and the available after 8 hours. d. Provide the names of any outside resources such as Licensee or private (e.g., university, contractor, mutual-aid) field team resources, if any. If outside resources are used, provide LOAs with private organizations (see NUREG Criterion C.4). <p>3. <u>Transportation:</u> The plans provided for review are not complete with regards to types and sources of vehicles provided for the field teams.</p> <ul style="list-style-type: none"> a. Specific means of transportation (e.g., types of vehicles; four-wheel drive vehicles or boats where needed to reach monitoring or sampling locations). <p>4. <u>Direction of Field Teams:</u> The plans provided for review do not specify the decision-making process that will be used for the placement and movement of teams, including procedures for determining the locations, within the plume pathway, that will be suitable for collecting air samples by taking open- and closed-window ambient exposure rate measurements.</p> <ul style="list-style-type: none"> a. Clarify who (by title) is in charge of the decision making process for placement and movement of field teams. b. Procedures for determining the locations, within the plume pathway, that are suitable for collecting air samples that can be used to effectively characterize the release. <p>5. <u>Field Monitoring Equipment:</u> the plans provided for review do not include an inventory list of equipment that will be taken into the field by RFMTs.</p> <ul style="list-style-type: none"> a. An inventory list of the RMFT equipment and supplies to be taken into the field by each RFMT. <p>6. <u>Field Team Procedures:</u> The plans provided for review are not complete with regards methods for monitoring, collecting and analyzing samples.</p> <ul style="list-style-type: none"> a. The locations of predetermined field monitoring points and the use of ad hoc monitoring points during an incident. Also address how teams will be directed to those points (coordinate system, etc.) b. Protocols for clear communications and verification of measured values. c. Process to verify instrument calibration 	

RAI Number	RAI Description	State/County
	<ul style="list-style-type: none"> d. Procedures for operational checks including battery check e. Procedures for checking a low-range instrument, with a check-source, (e.g. ensuring the instrument measures +/- 20% of a reference value using the designated check source). f. Clarify if teams will collect air samples near a peak exposure rate reading, centerline of the plume g. Clarify if additional samples will be taken at other locations, including areas near the plume edge. h. Clarify how teams will obtain a reproducible geometry when measurements are taken for counting air sample filters. i. Provide the data sheet for air sample calculations <p>7. <u>Laboratories</u>: The plans provided for review are not complete with regards identifying the estimated time required to transport collected air samples to the designated laboratory, perform the required analyses, and transmit the results to the appropriate location (e.g., dose assessment group). Nor does the plan delineate that transportation of plume phase samples to the laboratory should be completed within 4 hours.</p> <ul style="list-style-type: none"> a. Identify the estimated time required to transport collected air samples to the designated laboratory; clarify whether transportation of plume phase samples to the laboratory should be completed within 4 hours. b. Identify the estimated time required to perform the required analyses. c. Identify the estimated time required to transmit the results to the appropriate location (e.g., dose assessment group). 	
BLFNT - 036	<p>NUREG Criterion I.9:</p> <p>Although the RMFTs sample collection equipment and field-counting equipment appears to be adequate to collect and measure radioiodine at the required 10-7 uCi/cc sensitivity level, a required (minimum) sample volume and the sample counting efficiency was not provided to validate this calculation.</p> <p>Please provide the following information:</p> <ul style="list-style-type: none"> 1. Clarify the minimum sample volume for when collecting samples for radioiodine. 2. Provide the field counting equipment detection sensitivity for radioiodine and the calculation sheet for determining iodine concentrations in the field. 	<p><i>Alabama / Jackson and Dekalb Counties</i></p>

RAI Number	RAI Description	State/County
BLFNT – 037	<p>NUREG Criterion I.10:</p> <p>The personnel and equipment that will be involved in dose assessment; computer software and documentation (including data input procedures) that will be used during both the plume phase and ingestion phase are not fully addressed. Alternate methods that may be used (e.g., hand calculations) are not addressed in the material provided for review.</p> <p>Information (variables) that must be obtained in order to run the plume and ingestion models, including proper units of measure and a means for obtaining initial information (e.g., from Licensee monitors or inventory estimates) are not addressed in the material provided for review. The Alabama REPP and the proposed local plans do not address comparison of dose assessment model results with those of other organizations that perform dose assessment. Additionally, the Alabama REPP incorrectly states that, “The results of this (environmental) monitoring information serves to verify that the dispersion of radioactive materials is at least as conservative as predicted by meteorology and will not be substituted for dose calculations based upon release rates and meteorological data as supplied by the utility.” The appropriate use of field team data is to verify, validate and to modify computer projections with factual data.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. The Alabama Radiation Control Agency SOPs for dose assessment and development of PARs. 2. Describe the dose assessment team, and equipment that will be used in dose assessment activities for the plume phase and ingestion phase. 3. Describe the computer software and documentation (including data input procedures) that will be used for the plume phase and ingestion phase. 4. Describe how measured parameters (contamination levels, water and air activity) are related to dose rates for key isotopes and gross radioactivity measurements for the plume phase and ingestion phase. 5. Provide the methodology for estimating integrated dose from projected and actual dose rates and for comparing these estimates with Protective Action Guides for the plume phase and ingestion phase. 6. Include how measured contamination levels for water, air and soil are integrated with PAGs for the ingestion pathway. 7. Provide additional information on alternate methods and how 	<i>Alabama</i>

RAI Number	RAI Description	State/County
	<p>they may be used (e.g. hand calculations and RTM '96) for dose assessment.</p> <p>8. Describe the information (variables) and the source(s) of data that will be obtained and verification protocols to be used to run the model, including proper units of measure.</p> <p>9. Provide the methods for obtaining initial information (e.g., from Licensee monitors or inventory estimates).</p> <p>10. Provide the procedures for comparison of field team data to verify and, if necessary to modify computer model results and how these changes will be utilized in making or modifying Protective Action Recommendations for the plume phase and ingestion phase.</p>	
BLFNT – 038	<p>NUREG Criterion I.11:</p> <p>Provided plans do not include specific guidance regarding the monitoring strategy used by SRMAC to locate and track the plume, including who will enter the plume in an evacuated area to take radiation measurements and collect air samples from peak exposure rate areas near the plume's peak concentration.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Provide the monitoring strategy used by SRMAC in assigning FMTs to locate and track the plume. 2. Identify who will take radiation measurements and collect air samples from peak exposure rate areas near the plume's peak concentration, including inside evacuated areas. 	<i>Alabama / Jackson and Dekalb Counties</i>
BLFNT - 039	<p>NUREG Criterion J.2:</p> <p>Insufficient information is included in the materials provided for review to adequately assess whether State and/or County assistance will be provided the Licensee during site evacuation.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. State and County assistance to be provided the Licensee during site evacuation. 2. Alternative routes during inclement weather and/or high traffic density. 3. Coordinating arrangements with other offsite organizations to expedite evacuation of onsite personnel. 	<i>Alabama</i>
BLFNT – 040	NUREG Criterion J.9:	

RAI Number	RAI Description	State/County
	<p>The Alabama Radiological Emergency Plan and the proposed local plans do not include the following information: plans do not stipulate that the preferred protection action at a General Emergency ECL is to, at a minimum, evacuate a 2-mile radius and 5-miles downwind; reference the current (1998) FDA guidance regarding human food and animal feeds; address the use of field monitoring data as described in the Section II, REP Planning Guidance; or, clearly address precautionary actions to prevent contamination of foodstuffs.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Clarify why the plan does not stipulate that at the General Emergency ECL, the immediate protective action should be to evacuate immediately about 2 miles in all directions and 5 miles downwind, unless other conditions make evacuation dangerous (NUREG 0654, FEMA-REP-1, Rev 1, Supplement 3). (Also see NUREG Criterion J.10.m and D.4) 2. Provide additional information to address the use of field monitoring data as a basis for making decisions concerning protection of the public in locations outside the sheltered/evacuated area. 3. Clarify whether the State would consider reversing protective actions that have been implemented based on revised dose assessments or early field measurements. 4. Provide the justification for implementing an "Early Release" of students at the Alert ECL. Releasing students to their home (early dismissal or early release) is not the preferred action recommended by FEMA, as many children may be left at home with out transportation if the incident escalates and an evacuation is ordered. 5. Provide justification for not referencng the 1998 FDA guidance for as the decision basis for disposition of human food and animal feeds (63 FR 43402, August 13, 1998). Also see NUREG Criterion J.11. 6. Provide information to address sheltering animals and placing on stored feed as a precautionary measure to prevent contamination, or temporary food embargos of food stuffs (until radioisotope analysis of the food stuffs is complete). Also see NUREG Criterion J.11 	<p><i>Alabama / Jackson and Dekalb Counties</i></p>
<p>BLFNT – 041</p>	<p>NUREG Criterion J.10.a:</p> <p>Maps showing evacuation routes, special facilities, preselected radiological sampling and monitoring points, relocation centers in host areas, decontamination facilities, and shelter areas were not included in the information provided for review. The update schedule and organization responsible for map maintenance were also not included.</p>	

RAI Number	RAI Description	State/County
	<p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Provide maps showing evacuation routes, special facilities, preselected radiological sampling and monitoring points, relocation centers in host areas, decontamination facilities, and shelter areas. 2. Specify the update schedule and organization responsible for map maintenance. 	<i>Alabama</i>
BLFNT – 042	<p>NUREG Criterion J.10.b:</p> <p>Maps showing the population distribution around Bellefonte NP were not included in the information provided for review. Information or references regarding the populations of schools, daycare centers, other special populations, and recreation areas was also not included.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Provide maps showing the population distribution around Bellefonte NP. 2. Specify or reference information regarding the populations of schools, daycare centers, other special populations, and recreation areas in the Bellefonte EPZ. 	<i>Alabama / Jackson and Dekalb Counties</i>
BLFNT – 043	<p>NUREG Criterion J.10.d:</p> <p>In those plans provided for review, the following information was not included: details of schools and special facilities, names and addresses of relocation centers, transportation resources required, list of all disabled persons in the EPZ, procedure for keeping the list current, means of communication with parents, identification of prisons in the EPZ, and letters of agreement.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. <u>Schools:</u> <ol style="list-style-type: none"> a. Clarify the discrepancy between the proposed Jackson and DeKalb County plans and the proposed Appendix 3 to the Alabama REPP regarding when school children will be dismissed/released. b. Location, type of institution, age grouping, total population, means for implementing protective actions, transportation resources; c. Name and address of relocation centers (not just city or town); d. Time frames for implementing protective actions; 	<i>Alabama / Jackson and Dekalb Counties</i>

RAI Number	RAI Description	State/County
	<ul style="list-style-type: none"> e. Procedure for contacting and providing emergency information to school officials; f. Procedure for contacting and activating transportation resources (busses, vans, dispatchers and drivers); g. Procedure for notifying parents and guardians of the status and location of their children; h. Letters of agreement for transportation resources and relocation centers. (NUREG Criterion A.3). <p>2. <u>Health Care Facilities:</u></p> <ul style="list-style-type: none"> a. Location/Address, type of health care facility (hospital, nursing home, other), total population of each facility, transportation resources; b. Name and address of relocation center (not just city or town); c. Letters of agreement for transportation resources and relocation centers (NUREG Criterion A.3). d. Clarify if confined individuals will be initially sheltered in place and given KI, or evacuated. <p>3. <u>Disabled Persons:</u></p> <ul style="list-style-type: none"> a. List of all disabled persons in the EPZ and the procedure for keeping the list current; b. Transportation resources for disabled persons and Letters of Agreement for transportation resources and relocation centers (NUREG Criterion A.3); c. Name and address of relocation center (not just city or town); d. Procedure for protecting individuals who cannot be evacuated. <p>4. <u>Prisons:</u></p> <ul style="list-style-type: none"> a. Identify all prisons/jails in the EPZ; b. Persons responsible for planning and implementing protective actions for prisoners; c. Planned protective actions for prisoners; d. Transportation resources for prisoners; e. Name and address of relocation center (not just city or town) capable of handling prisoners; f. Letters of agreement for transportation resources and relocation centers (NUREG Criterion A.3). 	
BLFNT – 044	<p>NUREG Criterion J.10.e:</p> <p>The Alabama Radiological Emergency Plan and the proposed local plans are not complete with regards to the storage, distribution and use</p>	<i>Alabama / Jackson</i>

RAI Number	RAI Description	State/County
	<p>of potassium iodide as a radioprotective drug.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Describe the KI maintenance and storage programs for the State of Alabama and local emergency response agencies for use by emergency workers and the general public. 2. Describe how KI will be administered to institutional populations such as hospital patients; the current REP plan indicates that KI will be given to both the patients and institutional staff that will care for them but the methodology is not described. 3. Explain the manor in which individuals in health care institutions will receive the recommendation to take KI. 4. Explain how institutions will receive approval from their primary physician for the administration of KI to in addition to the patients' other medications. 5. Provide information regarding quantities, storage locations, and means of distribution of radioprotective drugs for institutions. This information is not described and it is unclear where the supply for institutionalized individuals will be maintained. 6. Provide information regarding the time required to complete the distribution of KI to emergency workers. 7. Clarify that medical testing for allergies to KI is not necessary. 	<p><i>State/County and Dekalb Counties</i></p>
BLFNT -045	<p>NUREG Criterion J.10.f:</p> <p>The Alabama Radiological Emergency Plan and the proposed local plans are not complete with regards to the criteria for recommending KI for institutionalized persons and emergency workers.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Describe the criteria for recommending KI for institutionalized persons and emergency workers. 	<p><i>State of Alabama</i></p>
BLFNT - 046	<p>NUREG Criterion J.10.g:</p> <p>The plans provided for review did not describe how people needing transportation will be identified, pickup points, transportation resources, legible maps, detailed evacuation routes, reception center names and addresses or letters of agreement.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. The means for determining the number of people needing transportation per planning area, including the method for maintaining it current. 2. The pickup points for those needing transportation. 	<p><i>State of Alabama</i></p>

RAI Number	RAI Description	State/County
	<ol style="list-style-type: none"> 3. Identify the necessary transportation resources (vehicles and drivers). 4. Legible maps for TCPs to include information regarding set up and traffic flow. 	
BLFNT – 047	<p>NUREG Criterion J.10.h:</p> <p>The plans provided for review do not include reception center, mass care center, host school, hospital, correctional facility and nursing home, names and addresses; handicap accessible facilities, management organization and staffing requirements for facilities; procedures for handling students at destinations; or letters of agreement.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Name, address and capacity of primary and backup reception centers, mass care centers and host schools. Indicate those facilities that are handicap accessible. 2. Management organization and staffing requirements for reception centers, mass care centers and host schools. 3. Procedures for handling students at reception centers and/or host schools. Include the location of students within the facility and procedure for pickup by parent or guardian. 4. Name, address and capacity of hospitals, correctional facilities and nursing homes that will receive evacuees. 5. Letters of agreement for reception centers, mass care centers, host schools, hospitals, correctional facilities and nursing homes as required by NUREG Criterion A.3. 	<i>State of Alabama</i>
BLFNT – 048	<p>NUREG Criterion J.10.i:</p> <p>The plans do not include adequate maps, a reference to the ETE report or the name and address of each Reception Center.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Legible maps for Emergency Response Planning Areas and evacuation routes (as identified in NUREG criterion J.10.a). 2. A State or local plan reference to the Bellefonte Nuclear Plant ETE Report. 3. Name and address of each Reception Center at the end of the routes. 	<i>Alabama / Jackson and Dekalb Counties</i>
BLFNT – 049	<p>NUREG Criterion J.10.j:</p> <p>The plans do not include information from Bellefonte Nuclear Plant ETE Report; the source of TCP/ACP equipment; maps of TCPs and</p>	<i>State of Alabama</i>

RAI Number	RAI Description	State/County
	<p>ACPs; means and frequency of advising TCP/ACP staff; or controlling access via water, air or rail.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. The number of individuals, number of traffic cones and number of barricades for each TCP and ACP (as shown in Bellefonte Nuclear Plant ETE Report, Appendix G, "Traffic Management" Table G-1). 2. The organization responsible for supplying the equipment (cones, barricades, etc.) for TCPs and ACPs. 3. The means and frequency of advising staff at TCPs and ACPs of emergency response activities 4. The procedures and responsibilities for controlling access via water (river), air or rail. 5. Maps showing the locations of Traffic Control Points (TCPs) and Access Control Points (ACPs). 6. Clarify the inconsistency between the BNP ETE report and the proposed Jackson and DeKalb County REPPs regarding who will be allowed access into the evacuating area. 	
BLFNT – 050	<p>NUREG Criterion J.10.k:</p> <p>The provided plans do not describe resources available to deal with evacuation route impediments or letters of agreements for these resources.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Provide information regarding the equipment and personnel (by organization) to clear impediments. 2. Letters of agreement for equipment and personnel if non-government organizations will support this effort, as required by NUREG Criterion A.3. 	<i>Alabama / Jackson and Dekalb Counties</i>
BLFNT – 051	<p>NUREG Criterion J.10.l:</p> <p>The plans do not include evacuation times for various populations under various weather conditions in different areas or the Bellefonte Nuclear Plant ETE Report.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. A State or local plan reference to the Bellefonte Nuclear Plant ETE Report. 2. Evacuation Time Estimates for special populations, school children, transit dependent people and all of the sectors or evacuation areas for the general public as found in the 	<i>Alabama / Jackson and Dekalb Counties</i>

RAI Number	RAI Description	State/County
	Bellefonte Nuclear Plant ETE Report.	
BLFNT – 052	<p>NUREG Criterion J.10.m:</p> <p>The provided plans do not adequately address the basis for pre-planned emergency actions, and the rationale used to make initial and subsequent PADS.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Provide clarification as to why immediate protective actions to, at a minimum, evacuate a 2-mile radius and 5 miles downwind is not the pre-determined action at a General Emergency ECL (Also see NUREG criterion D.4 and J.10.m). 2. Clarify what is meant by monitoring/sheltering, as stated in Alabama REPP, ESF #8, Tab 4, Section III.B. 3. Provide justification for sheltering general population groups (at a GE or when projected doses exceed evacuation PAGs) when the projected time in the area is less than three hours, as this generic guidance differs from that provided in EPA 400-R-92-001 or NUREG 0654/FEMA-REP-1, Rev.1, Supplement 3. 	<i>State of Alabama</i>
BLFNT – 053	<p>NUREG Criterion J.11(Alabama):</p> <p>The provided plans for Alabama specify protective measures to be used for the Ingestion EPZ, including the methods for protecting the public health [from consumption of contaminated foodstuffs] in the event of food contamination; however, additional information is required.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Provide an explanation why protective actions for Alabama are based on EPA 400-R-92-001, EPA Manual of Protective Action Guides and Protective Actions for Nuclear Incidents, (May 1992) instead of the current (1998) Food and Drug Administration publication Accidental Radioactive Contamination Of Human Food And Animal Feeds: Recommendations for State and Local Agencies. (Also see NUREG Criterion J.9) 2. Provide the derived intervention levels (DILs) that would warrant implementation of protective actions in Alabama, including the rationale and assumptions used to develop the DILs. 3. Provide an Agricultural Brochure, updated to include BNP. 4. Provide details on the State's use of precautionary actions for protecting the food chain, such as sheltering animals and 	<i>State of Alabama</i>

RAI Number	RAI Description	State/County
	<p>placing them on stored feed/water.</p> <ol style="list-style-type: none"> 5. Describe how the State will impose temporary embargoes prior to obtaining sample laboratory results. 6. Provide a description of the methodology to be used in Alabama to designate the areas of concern where monitoring and sampling is to be implemented. 7. Provide the names and addresses of contact points in Alabama for obtaining permission to collect samples in the BNP Ingestion EPZ. 8. Provide a description of the procedure in Alabama for reporting analytical results to the appropriate organization. 9. Provide the location of and the means of obtaining up-to-date information on the location of permanent agribusiness facilities in Alabama within the Ingestion EPZ. (This database should include facilities such as dairies, food processing plants, surface water supplies, water intakes, and other permanent facilities. Facilities outside the Ingestion EPZ that could receive potentially contaminated products from within the Ingestion EPZ and names and telephone numbers for points of contact should also be included in the database.) 10. Provide the location of and the means of obtaining up-to-date information on land use in Alabama. (This database should include information on the status of harvesting.) 11. Provide the means by which the agribusiness person will be notified of a protective action in Alabama that would affect his/her ability to sell or move food or products produced. 12. Provided the update the Alabama REPP, Emergency Support Function (ESF) #11, Section VIII, to include the major crops for pertinent counties for the Bellefonte Nuclear Plant. 13. Provide a map for the 50-mile Ingestion Map for the Bellefonte Nuclear Plant; similar to those for the Farley Nuclear Power Plant and the Browns Ferry Nuclear Power Plant (see Alabama REPP, ESF-8, Section VIII). 14. The State of Georgia Radiological Emergency Response Plan and any Georgia Department of Natural Resources, Environmental Protection Division (DNR-EPD) and/or Georgia Department of Agriculture Standard Operating Procedures (SOPs) for ingestion pathway activities, for example (1) detection of contamination (i.e. sample collection and lab analysis), (2) estimation of the dose commitment consequences from the ingestion pathway, and (3) any protective measures (i.e., impoundment, decontamination, processing, decay, product diversion and preservation). 	
BLFNT – 054	<p>NUREG Criterion J.11(Tennessee):</p> <p>The provided plans for Tennessee specify protective measures to be</p>	<i>State of Alabama</i>

RAI Number	RAI Description	State/County
	<p>used for the Ingestion EPZ, including the methods for protecting the public health [from consumption of contaminated foodstuffs] in the event of food contamination; however, additional information is required.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Provide an update to the Tennessee Emergency Management Plan to include ingestion pathway response activities for the proposed BNP. 2. Provide an updated specific ingestion pathway protection plan to include the proposed BNP (such as Annex K). 3. Provide a description of the methodology to be used in Tennessee to designate the areas of concern where monitoring and sampling is to be implemented. 4. The procedure for reporting analytical results to the appropriate organization. 5. Provide a description of the location of and the means of obtaining up-to-date information on the location of permanent agribusiness facilities in Tennessee within the BNP Ingestion EPZ. (This database should include facilities such as dairies, food processing plants, surface water supplies, water intakes, and other permanent facilities. Facilities outside the Ingestion EPZ that could receive potentially contaminated products from within the Ingestion EPZ and names and telephone numbers for points of contact should also be included in the database.) 6. Provide a description of the location of and the means of obtaining up-to-date information on land use in Tennessee. (This database should include information on the status of harvesting.) 7. Clarify whether the State of Tennessee uses the (1998) Food and Drug Administration publication, Accidental Radioactive Contamination of Human Food and Animal Feeds: Recommendations for State and Local Agencies. If the 1998 FDA guidance is not used, provide the protective actions planned for Tennessee and the rationale for the selection of actions. 8. Provide a description of the Derived Intervention Levels (DILs) that would warrant implementation of protective actions in Tennessee, including the rationale and assumptions used to develop the DILs. 9. Provide a description of the availability of suitable maps of Tennessee for recording various field data. 	
BLFNT – 055	<p>NUREG Criterion J.11(Georgia):</p> <p>The provided plans for Georgia specify protective measures to be used</p>	<i>State of Tennessee</i>

RAI Number	RAI Description	State/County
	<p>for the Ingestion EPZ, including the methods for protecting the public health [from consumption of contaminated foodstuffs] in the event of food contamination; however, additional information is required.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Provide an update to the Georgia Radiological Emergency Plan, for the Bellefonte Nuclear Plant, like that provided for the other power plants whose 50-mile Ingestion EPZ includes part of Georgia. 2. Provide an update to Attachment 1 of the Georgia Radiological Emergency Plan, Annex F to include the Bellefonte Nuclear Plant. 3. Provide a description of the methodology to be used in Georgia to designate the areas of concern where monitoring and sampling is to be implemented. 4. Provide the addresses of contact points in Georgia for obtaining permission to collect samples. 5. Provide a description of the procedure for reporting analytical results to the appropriate organization. 6. Provide the location of and the means of obtaining up-to-date information on the location of permanent agribusiness facilities in Georgia within the BNP Ingestion EPZ. (This database should include facilities such as dairies, food processing plants, surface water supplies, water intakes, and other permanent facilities. Facilities outside the Ingestion EPZ that could receive potentially contaminated products from within the Ingestion EPZ and names and telephone numbers for points of contact should also be included in the database.) 7. Provide the location of and the means of obtaining up-to-date information on land use in Georgia (This database should include information on the status of harvesting.) 8. Clarify whether the State of Georgia uses the (1998) Food and Drug Administration publication, Accidental Radioactive Contamination of Human Food and Animal Feeds: Recommendations for State and Local Agencies. 9. Provide the derived intervention levels (DILs) that would warrant implementation of protective actions in Georgia, including the rationale and assumptions used to develop the DILs. 10. Provide a description of the availability of suitable maps of Georgia for recording various data. 	
BLFNT – 056	<p>NUREG Criterion J.12:</p> <p>The provided plans partially describe the means for registering and monitoring of evacuees at relocation centers in host areas. The</p>	<i>State of Georgia</i>

RAI Number	RAI Description	State/County
	<p>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. Insufficient information was provided to adequately assess this requirement.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. If only emergency personnel and evacuees who are believed to have been exposed to high levels of radiation (greater than 100 mR/hr, or approximately 20 pCi/cm³ of radioiodine) or airborne particulate radioactivity for more than an hour are to be monitored, describe how this determination will be made and its basis (also see NUREG Criterion K.5.a). 2. Provide an estimate of the monitoring capacity (in persons per hour) of the portal monitors and the number of persons required to operate the portal monitor. 3. Clarify if population estimates included in the proposed Jackson and DeKalb County REP, Annex K, Appendix 2, "ERPA Population and Reception Centers," includes transient and non-EPZ employee populations (individuals who work in the EPZ but reside outside the EPZ and need monitoring), as the numbers of individuals varies with that in the Bellefonte ETE Report. 4. In the proposed Jackson and DeKalb County REPs, provide a description of the physical layout of the reception centers, with diagrams that show the flow and layout of operations, including a description of the means for separating contaminated, uncontaminated, and unscreened individuals and vehicles, 5. Provide a description of contamination control measures, such as floor coverings and personal protective equipment 6. Describe in the proposed Jackson and DeKalb County REPs as to how the portal monitors will be set up and/or tested to ensure that a one microcurie cesium-137 source located on the centerline between the two sides can be detected, as required by FEMA-REP-21, "Contamination Monitoring Standard for a Portal Monitor Used for Radiological Emergency Response" (Also in NUREG Criterion K.5.a). 7. Procedures for contaminated waste collection, handling, storage, and disposal. 	
BLFNT – 057	<p>NUREG Criterion K.3.a:</p> <p>Detailed information relative to exposure control and dose tracking is insufficient or not included in the plans.</p> <p>Please provide the following information:</p>	<i>State of Alabama</i>

RAI Number	RAI Description	State/County
	<ol style="list-style-type: none"> 1. Clarify and, if necessary, correct the use of units to report dose (i.e. TEDE, committed dose equivalent, or dose equivalent) in rem and exposure in roentgens (R). 2. If an external exposure to total effective dose equivalent (TEDE) conversion factor less than the federally recommended value of 5 rem/R is used, provide technical justification (the plan currently uses a value of 2 rem/R). 3. Clarify the limit on the committed dose equivalent to the thyroid (as noted in Jackson and DeKalb county proposed plan appendices, to be 26 rem); and if it differs from that in the FDA guidance as given in "Guidance Potassium Iodide as a Thyroid Blocking Agent in Radiation Emergencies" (December 2001), provide technical justification. 4. Provide detailed information regarding dosimetry issue and return at self-protection stations for the proposed BNP. 5. Clarify and, if necessary correct, the column headers of the "Dosimetry Distribution" records so that the model numbers and ranges of the dosimeters agree. 6. Provide detailed information about the types and quantities of dosimeters and dosimeter chargers available per location, and the number of persons (emergency workers) requiring dosimetry. 7. Provide information about the processor for permanent record dosimeters and procedures for requiring early reading of permanent record dosimeters. 8. Provide information regarding the decision chain and the approval authority for emergency workers incurring doses in excess of 5 rem. 9. Clarify that dose limits for emergency workers apply only during the period of the emergency, and that the emergency ends when (1) the release has ended and the plume has dispersed, (2) valuable property has been protected, and (3) the public is protected by either evacuation or relocation in accordance with applicable PAGs. 10. Describe the dose limits and method of tracking accumulated radiation dose in the post plume phase. 11. Clarify if authorization is required to exceed the occupational limits provided in 10 CFR 20 and the Rules of the State Board of Health, Chapter 420-3-26, or if authorization is only required to exceed the limits in Alabama REPP Emergency Support Function (ESF) #8 – Public Health and Medical Services, Tab 5, Section I, "Emergency Worker Exposure." (See also RAI for Criterion K.4) 	
BLFNT – 058	NUREG Criterion K.4:	

RAI Number	RAI Description	State/County
	<p>The plans provided for review do not fully specify: special conditions requiring additional limitations (e.g., pregnant workers); the procedure(s) for authorization to exceed pre-authorized exposure limits and the management of workers' exposure above the limits, the point of contact if the allowable upper limit is reached for authorization to remain in the hazardous area and receive additional exposure, (e.g., for special, lifesaving missions); and information on risk and threshold doses for health effects to be provided to emergency workers volunteering for higher dose exposure</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Provide information in the Proposed Jackson County REP and Proposed DeKalb County REP on limitations (i.e. reduced exposure limits) for pregnant women and individuals under the age of 18. <p>RECOMMENDATION(S):</p> <ol style="list-style-type: none"> 1. Clarify if authorization is required to exceed the occupational limits provided in 10 CFR 20 and the Rules of the State Board of Health, Chapter 420-3-26, or if authorization is only required to exceed the limits in Alabama REPP Emergency Support Function (ESF) #8 – Public Health and Medical Services, Tab 5, Section I, “Emergency Worker Exposure.” 2. Clarify the role of the Radiological Officers at the Forward Command Post in the decision chain for authorizing doses authorizing emergency workers to incur exposures in excess of the EPA General Public Protective Action Guides. 3. Clarify the procedure authorizing emergency workers to exceed pre-authorized exposure limits, including the person to contact for authorization to remain in the hazardous area and receive additional exposure if the allowable upper limit is reached. 4. For individuals who volunteer to receive doses in excess of the limits stated in plan, provide a description of the full reporting and decision chain process from the emergency worker through the final authorizing person back to the emergency worker. 5. Provide information on risk and threshold doses for health effects that would be provided to emergency workers volunteering for higher dose exposure (i.e. life-saving mission). 	<p><i>State of Alabama</i></p>
<p>BLFNT – 059</p>	<p>NUREG Criterion K.5.a:</p> <p>The provided plans do not include an action level for determining the need for decontamination when using a portal monitor, descriptions of</p>	<p><i>Alabama / DeKalb and Jackson</i></p>

RAI Number	RAI Description	State/County
	<p>facilities, locations of facilities, and procedures for controlling the spread of contamination.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> In the proposed Jackson and DeKalb County REPs, provide a description of the facilities to be used for monitoring and decontamination, including their location and maps showing the layout of the facility and any procedures to control the spread of contamination inside the facility. <p>RECOMMENDATION(S):</p> <ol style="list-style-type: none"> If only emergency personnel and evacuees who are believed to have been exposed to high levels of radiation (greater than 100 mR/hr, or approximately 20 pCi/cm³ of radioiodine) or airborne particulate radioactivity for more than an hour are to be monitored, describe how this determination will be made, its basis and how this will be communicated to the evacuating population and emergency workers. Describe in the proposed Jackson and DeKalb County REPs as to how the portal monitors will be set up and/or tested to ensure that a one microcurie cesium-137 source located on the centerline between the two sides can be detected, as required by FEMA-REP-21, "Contamination Monitoring Standard for a Portal Monitor Used for Radiological Emergency Response." 	<p><i>Counties</i></p>
<p>BLFNT – 060</p>	<p>NUREG Criterion K.5.b:</p> <p>The provided plans do not include the location of emergency worker decontamination facilities, including the address and a diagram of the physical layout; provisions for storage of contaminated clothing and other personal items; the number of people trained and available to perform decontamination in the event of an emergency; decontamination of wounds; a listing of supplies to perform decontamination in the event of an emergency; and procedures for collection, handling, storage, and disposal of contaminated waste.</p> <p>Please provide the following information:</p> <p>RECOMMENDATION(S)</p> <ol style="list-style-type: none"> Provide the location of emergency worker decontamination facilities, including the address and a diagram of the physical layout showing the flow of individuals and vehicles through the facilities. Describe provisions for storage of contaminated clothing and other personal items, including procedures that will be implemented to avoid raising the background gamma exposure 	<p><i>Alabama / Jackson and Dekalb Counties</i></p>

RAI Number	RAI Description	State/County
	<p>rate significantly in the monitoring area, the location where the wastes will initially be stored, and how the storage areas will be marked and secured.</p> <ol style="list-style-type: none"> 3. Provide the number of people trained and available to perform decontamination in the event of an emergency 4. Describe the protocol for decontamination of wounds. 5. Provide a listing of supplies available to perform decontamination in the event of an emergency 	
BLFNT – 061	<p>NUREG Criterion L.1:</p> <p>The plans do not include letters of agreement for hospitals, medical facilities and technical personnel; individual facility capabilities; description of hospital and support services; description of dosimetry procedures; or hospital/medical facility plans or procedures.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. LOAs with hospitals/medical facilities. This includes confirmation that Huntsville Hospital is the primary hospital for Jackson County. LOAs should state hospital/medical facility name; location of facility; type of capabilities; approximate number of contaminated, injured, or exposed patients that can be treated; and type of accreditation (e.g., Joint Commission on Accreditation of Hospitals [JCAH], if any). NOTE: LOAs also apply to NUREG Criterion A.3. 2. LOAs for technical staff that are not employed by the hospital/medical facility. LOAs include name(s) of organization(s) that would supply technical staff and the type of services that would be provided. <p>RECOMMENDATION(S):</p> <ol style="list-style-type: none"> 1. Individual facility capabilities, including the number of radiologically trained medical personnel and support staff; 2. Description of hospital and support service operations for treating contaminated, injured, or exposed individuals. 3. Local hospital plans or implementing procedures which describe the following: <ul style="list-style-type: none"> • The maximum number of contaminated, injured, or exposed patients that could be treated at one time; • Procedures that would be used if an overflow occurred; • Approximate response time (the time required to establish controlled areas and to assemble and fully prepare the necessary medical/radiological staff); • Details of notification, including a list of pertinent information that would be received regarding the 	<p><i>Alabama / Jackson and Dekalb Counties</i></p>

RAI Number	RAI Description	State/County
	<p>incident and patients;</p> <ul style="list-style-type: none"> • Staff who would be present and their responsibilities; • En route communications methods; • The incoming emergency vehicle route; • A list of equipment available to the staff, including personal protective gear (e.g., gloves, booties); • Procedures for preparation of the decontamination area, including the use of floor coverings, filtered ventilation systems, and appropriate radiation warning signs; • A diagram of the treatment and decontamination area, including a buffer zone separating the REA from the rest of the facility; • Procedures for decontamination of patients, including contamination control, disposal of contaminated waste and re- monitoring after decontamination; • An example of the system used to record patient data; • Number of radiologically trained medical personnel available to be mobilized during a response; this must include at least one physician and one nurse who are capable of supervising the evaluation and treatment of contaminated, injured, or exposed patients; • Hospital staff exposure control: Provide a description of dosimetry procedures, including types and ranges, the process for issuance, exposure limits and tracking, including record keeping and final receipt for processing. 	
BLFNT – 062	<p>NUREG Criterion L.3:</p> <p>The plans do not include the capabilities of the other hospitals considered able to provide medical support for contaminated injured individuals.</p> <p>Please provide the following information:</p> <p>RECOMMENDATION(S):</p> <ol style="list-style-type: none"> 1. A matrix or list in an appendix to a plan or procedure, which includes the following information for each of the other hospitals considered able to provide medical support for contaminated injured individuals: <ol style="list-style-type: none"> a. Name b. Address c. Type (private, public, military, etc) d. Ambulatory capacity and non-ambulatory capacity e. Special radiological capabilities: availability of 	<p><i>Alabama / Jackson and Dekalb Counties</i></p>

RAI Number	RAI Description	State/County
	<p>specific radiologically trained staff (e.g., health or medical physicist); specialized monitoring equipment available; capabilities for analyzing samples for internal and external contamination.</p>	
BLFNT – 063	<p>NUREG Criterion L.4:</p> <p>The plans do not include detailed procedures for transportation providers, transport of individuals, maintaining communications, monitoring of individuals, contamination control measures or decontamination measures.</p> <p>Please provide the following information:</p> <p>RECOMMENDATION(S):</p> <ol style="list-style-type: none"> 1. Clarify (by title) the person who is responsible for determining the appropriate hospital/medical facility to which a contaminated, injured, or exposed individual is transported including the process for selecting a facility based on the extent of contamination and nature of the injuries. 2. Provide LOAs for transportation providers (LOAs that include the name of the organization, the type of services that will be provided, and the maximum number of vehicles that can be provided.). Written agreements for the use of nonspecialized vehicles (e.g., auto, van, or bus) or specialized vehicles (e.g., ambulance, med evac, critical care unit). LOAs also apply to NUREG Criterion A.3. 3. Clarify the procedures for requesting additional emergency medical services, as well as procedures that would be followed if an individual were found to be contaminated or internally exposed after being monitored at a reception center. 4. Describe the communication procedures for transport crews to follow when transporting an individual to a hospital/medical facility 5. Identify, by title, the person who would receive notification from the transport crew and who in turn would notify the REA staff to begin setup. 6. Procedures that include a list of information that should be provided to the receiving hospital/medical facility (e.g., data on the individual's physical condition, vital signs, type of radiological contamination, and estimated time of arrival. 7. Identify, by title, the person who will perform the patient monitoring function to determine the nature and extent of external radiological contamination of an individual. Specify whether patient monitoring is performed in the field prior to transport or immediately upon arrival at the hospital/medical 	<i>Alabama</i>

RAI Number	RAI Description	State/County
	<p>facility.</p> <ol style="list-style-type: none"> 8. A written agreement with the licensee, if patient monitoring may be performed by Licensee personnel. 9. Describe the contamination control measures to be followed during transport of contaminated, injured, or exposed individuals. 10. Clarify where decontamination of transport vehicle would take place. 	
BLFNT – 064	<p>NUREG Criterion M.3:</p> <p>Plans do not include the means for keeping all of the involved response organizations informed of procedures developed and actions to be taken during the intermediate and late phases of an accident and of any changes in organizational structure.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. ADEM ESF-5 SOG <p>RECOMMENDATION(S):</p> <ol style="list-style-type: none"> 1. Clarify the means that will be used to keep all involved response organizations informed of the recovery phase plans and procedures being developed, such as what the remedial measures will be, how long they will take, and what the final outcome is expected to be. (NIMS compliant IAP processes and distribution). 2. Provide information on expected changes, if any, which might take place in the organizational structure between the early phase and the intermediate and late phases. 	<i>Alabama / Jackson and Dekalb Counties</i>
BLFNT – 065	<p>NUREG Criterion M.4:</p> <p>The plans provided for review do not clearly describe how, the total population dose (or exposure) would be calculated to include the intermediate and late phases.</p> <p>Please provide the following information:</p> <p>RECOMMENDATION(S):</p> <ol style="list-style-type: none"> 1. Clarify how, the total population dose (or exposure) would be estimated; including the intermediate and late phases, for all pathways, including dose from ground deposition and resuspension of radioactive materials. 2. Describe of any assistance, required or expected, from Federal agencies to periodically estimate the total population exposure from all pathways. 	<i>State of Alabama.</i>

RAI Number	RAI Description	State/County
BLFNT – 066	<p>NUREG Criterion P.4:</p> <p>The plans provided for review do not include documentation of the Annual Letter of Certification, nor of recent changes incorporated in the plan. The proposed Jackson and DeKalb County plans do not provide information regarding means for updating plans and certifying currency to the State.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Provide documentation to certify currency of plans and agreements (e.g. Annual Letter of Certification for the Alabama REPP). 2. Provide documentation that corrections identified in drills and exercises have been incorporated into REP plans. 3. For Jackson and DeKalb County, provide information regarding the method for updating plans and agreements, and for certifying their currency on an annual basis. 	<i>State of Alabama</i>
BLFNT – 067	<p>NUREG Criterion P.5:</p> <p>The Alabama EOP does not include a current record of changes. The information provided in the Alabama REPP, proposed Jackson County REP, and proposed DeKalb County REP does not include a current record of changes, current distribution list for the plans and their updates, or specific information about the update cycle. None of the information provided for review describes or demonstrates how changes will be marked or communicated to the reader.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Show how extensive changes are communicated to the reader (e.g. markings or visual equivalent on revised pages, a summary list of changes in cases when revision bars are impractical) for the Alabama EOP and the Alabama REPP. <p>RECOMMENDATION(S):</p> <ol style="list-style-type: none"> 1. Provide an up to date distribution list for the Alabama REPP and proposed distribution lists for the proposed Jackson County REP and proposed DeKalb County REP; 2. Identify the individual responsible (by title) for distributing updating and distributing Jackson and DeKalb County plan updates. 3. Show how plan changes are indicated Jackson and DeKalb County plans 4. Show how extensive changes are communicated to the reader 	<i>Alabama / Dekalb and Jackson Counties</i>

RAI Number	RAI Description	State/County
	(e.g. a summary list of changes in cases when revision bars are impractical) Jackson and DeKalb County REP plans.	
BLFNT – 068	<p>NUREG Criterion P.6:</p> <p>The Alabama EOP, the proposed Jackson County REP, and proposed DeKalb County REP do not include a list of supporting plans.</p> <p>Please provide the following information:</p> <p>RECOMMENDATION(S):</p> <ol style="list-style-type: none"> 1. Provide a list of supporting plans for the Alabama EOP. 2. Provide a list of supporting plans for the proposed Jackson County REP and proposed DeKalb County REP. This listing should include local or municipal plans, school district plans, hospital plans, etc. 	<i>Alabama / Jackson and Dekalb Counties</i>
BLFNT – 069	<p>NUREG Criterion P.7:</p> <p>The plans provided for review do not include a list of implementing procedures associated with the plan and what section(s) of the plans are implemented by each procedure.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Provide a list the implementing procedures associated with each plan and what section(s) of the plan are implemented by each procedure (Alabama EOP, Alabama REPP, proposed Jackson and DeKalb County Plans). <p>RECOMMENDATION(S):</p>	<i>Alabama / Jackson and Dekalb Counties</i>
BLFNT – 070	<p>NUREG Criterion P.8:</p> <p>The proposed Jackson County REP and proposed DeKalb County REP do not contain a NUREG-0654 cross-reference. Additionally, the NUREG-0654 cross reference contained in the Alabama REPP should be updated to include the proposed BNP.</p> <p>Please provide the following information:</p> <ol style="list-style-type: none"> 1. Provide NUREG-0654 cross- reference for the proposed Jackson County REP and proposed DeKalb County REP. <p>RECOMMENDATION(S):</p> <ol style="list-style-type: none"> 1. Provide an updated NUREG-0654 cross-reference to include changes made to the Alabama EOP and REPP supporting the proposed BNP. 	<i>Alabama / Jackson and Dekalb Counties</i>