PMLevyCOLPEm Resource

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Sent: Thursday, April 23, 2009 12:01 PM
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Subject: DRAFT RAI - 2405 - SRP section 13.3 - Levy County Units 1 and 2 Combined License Application
Attachments: LNP Draft RAI 2405 - 13.3.doc

Importance: High

Attached is a draft RAI related to SRP section 13.3 for the Levy County Units 1 and 2 Combined License Application. Please let me know if you would like to schedule a conference call to discuss this RAI.

Thank you,
Brian

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Request for Additional Information No. 2405
Levy County, Units 1 and 2
Progress Energy Florida, Inc.
Docket No. 52-029 and 52-030
SRP Section: 13.03 - Emergency Planning
Application Section: COL Part 5 - Emergency Plan

QUESTIONS for Licensing and Inspection Branch (NSIR/DPR/LIB) (EP)

13.03-***

SITE-1: Assignment of primary responsibilities for emergency response
Basis: 10 CFR 50.47(b)(1); NUREG-0654/FEMA-REP-1 Evaluation Criterion A.1.a; Evaluation Criterion A.1.b; Evaluation Criterion A.1.c; 10 CFR 50, Appendix E.IV.A.8
SRP ACCEPTANCE CRITERIA: Requirements A and B; Acceptance Criteria 1, 2 and 18

A. Section A, "ASSIGNMENT OF RESPONSIBILITY (ORGANIZATIONAL CONTROL)", (pages A-1/12) of the Levy Nuclear Plant (LNP) Emergency Plan provides a list of participating organizations and a discussion of their roles and responsibilities. There are inconsistencies noted between the text and Figures A-1, A-2 and A-3. Provide a resolution of the inconsistencies between the narrative, figures and tables as identified below:

- The narrative in Part A.1.a describes the "principal State, county and municipal, and Federal government organizations and other agencies ..." Figure A-1 identifies three organizations, "FBI", "NWS", and "DNR" that are not included in the narrative.

- The Department of Natural Services (DNS) is identified in Figure A-3 as a State organization in support of radiological response to an emergency at LNP. Provide a narrative for the DNS in the LNP Emergency Plan.

- The key roles of the State Warning Point-Tallahassee (SWPT) and State of Florida Department of Community Affairs, Division of Emergency Management (DEM) in coordinating response activities are not portrayed in Figures A-1 and A-2.

- Figure A-2 appears to describe communications between facilities and not functional relationships between the organizations.

- Appendix 3 lists a Certification Letter with the Nature Coast Emergency Medical Services Fire Department, but this agency is not listed in the text.

- Table A-1, "Primary Emergency Response Organizations," (pages A-11/12) lists several agencies that are described as "Secondary" support agencies in the State of Florida REMP.

B. To comply with the requirements of 10 CFR 52.79(a)(22)(i) and NUREG-0654/FEMA-REP-1, evaluation criterion II.A.3., a list of certifications and/or letters of agreement

between Progress Energy and other emergency response support organizations are provided in Appendix 3 "Certification Letters" to Part 5, "Emergency Plan," of the COL application.

1. Provide a letter of agreement between Progress Energy and local law enforcement that identifies the emergency measures to be provided and mutually acceptable criteria for their implementation, along with specific arrangements for the exchange of information.

2. Provide the finalized letters of agreement between Federal, State, and local agencies and other support organizations having an emergency response role within the Emergency Planning Zones (e.g., local law enforcement, medical support, State and County Emergency Management organizations). The agreements should identify the emergency measures to be provided and mutually acceptable criteria for their implementation, along with specific arrangements for the exchange of information.

   These agreements may be provided as an appendix to the LNP Emergency Plan or incorporated into the plan itself with a signature page to serve as a verification of the agreement. (See also, NUREG-0800 (SRP) Section 13.3; NUREG-0654/FEMA-REP-1, evaluation criterion II.A.3.)

   As an alternative to submitting finalized letters of agreement, the applicant may propose a license condition, or ITAAC, providing for verification that the finalized letters of agreement are current, and in place, prior to the full participation exercise conducted within 2 years of the scheduled date for initial loading of fuel.

13.03-***

SITE-2: Onsite emergency response organization assignments
Basis: 10 CFR 50.47(b)(2); 10 CFR 50, Appendix E.IV.A.2.a; Appendix E.IV.A.2.b; Appendix E.IV.A.2.c; Appendix E.IV.A.4; Appendix E.IV.A.5; NUREG-0654/FEMA-REP-1, Evaluation Criterion B.1; Evaluation Criterion B.3; Evaluation Criterion B.5; Evaluation Criterion B.6; Evaluation Criterion B.7; Evaluation Criterion B.8; Evaluation Criterion B.9
SRP ACCEPTANCE CRITERIA: Requirements A and B; Acceptance Criteria 1 and 2

A. Section B, "On-Site Emergency Organization," of the LNP Emergency Plan describes the onsite emergency organization.

1. Several positions (e.g., Shift Technical Advisor, Unit Senior Control Operators, Control Operators) are identified in Table B-1, "Minimum Staffing Requirements for Emergencies," and Figure B-2, "On-Site Emergency Response Organization (CR,TSC,OSC)," as being a part of the on-site emergency organization, however there is no discussion provided regarding their responsibilities in Section B. Provide a brief discussion in the LNP Emergency Plan that addresses the primary responsibilities for emergency response for each position described as part of the on-site emergency response organization.

2. Provide resolution for the apparent discrepancies between the narrative in Section B, "On-site Emergency Organization," Figure B-1, "Levy Emergency Response Organization," Figure B-2, "On-Site Emergency Response Organization (CR, TSC, OSC), Figure B-3, "Off-site Emergency Response Organization (EOF/ENC)," and Table B-1, "Minimum Staffing Requirements for Emergencies," as follows:

A. The Superintendent – Shift Operations (S-SO) is listed as a minimum staffing position in Table B-1, but not in Figure B-2.

B. The narrative in Section B.5.1 states that the Chemistry and Radiological Control teams assemble in the OSC. Table B-1 indicates that these teams are located in the Technical Support Center (TSC).

C. The narrative discusses the Repairs Coordinator as being located in the TSC. Figure B-2 indicates the Repairs Coordinator is located in the OSC.

D. The narrative in Section B.1, Table B-1 and Figure B-2 indicate that emergency response teams assemble and are managed out of either the TSC or OSC. The block diagram in Figure B-1 does not model this organization.

E. Figure B-1 shows the Fire Brigade under the control of the EC, but only shows the TSC/OSC, not the Control Room. The Fire Brigade is shown as being part of the Control Room organization in Figure B-2.

3. Clarify the interfaces among the onsite functional areas, and offsite support agencies and services as identified below:

A. Figure A-1 indicates that LNP only interfaces with the NRC Headquarters and the associated Regional office as the key federal agency. Clarify the interrelationships in Figure A-1 such that the figure clearly shows interrelationships with other key federal response organizations (e.g., FEMA), or explain why this discussion is unnecessary.

B. Figure B-1 displays the TSC, OSC, and EOF with associated lines of authority and communication. Clarify the role of the TSC or OSC such that reporting relationships with response teams are clearly identified.

C. Figure B-2 shows the organization within the control room and the TSC/OSC. Clarify the meaning of connecting lines in the legend.

D. There is no mention of interface with Crystal River 3 (CR3), including how the EOF would be shared with CR3 during a common emergency, or who would direct emergency response and evacuations during a common emergency. Please provide this information or describe justify why it is not needed.

E. Figure B-3 describes the offsite emergency response organization. There is no interface shown with the licensee headquarters or CR3 as described in Section B-5, "Off-site Emergency Response Organization" (page B-8). Please provide this information or describe justify why it is not needed.

F. The text in 5.2.a," EOF Director," (page B-7) indicates that after the EOF is

operational; the EOF director assumes some of the responsibilities of the EC-CR for direct interface with offsite authorities. Clarify whether the EOF Director assumes responsibilities from the EC-CR or the EC-TSC.

B. Evaluation Criteria B.7.a and b of NUREG-0654/FEMA-REP-1,"Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Nuclear Power Plants," states that each licensee shall specify corporate management, administrative and technical support personnel who will provide logistical support for emergency personnel and technical support for planning and reentry/recovery operations. Provide additional information in the LNP Emergency Plan that summarizes the augmented staff and support for these activities or describe why such information is not needed. As appropriate, update Figures B-2 and B-3 to reflect these positions.

C. Section B.8, "Support from Contractor and Private Organizations," (pages B-9/10) lists contractor and private organizations that are available to assist in emergency response. Crystal River 3 is not listed as an organization that would be available to augment the emergency organization even though CR3 is listed in Section C as having a laboratory that could process high-level radioactivity samples analytical services. Provide clarification about the availability of technical assistance from CR3.

D. Section B.8, "Support from Contractor and Private Organizations," (pages B-9/10) lists contractor and private organizations that are available to provide support in the event of an emergency at LNP. Provide additional information in the LNP Emergency Plan identifying, by position and function to be performed, other employees of the licensee or consultants with special qualifications for coping with emergency conditions that may arise and the special qualifications of those persons.

E. Section 5, "Plant Emergency Response Staff," of the LNP Emergency Plan states that Table B-1, ""Minimum Staffing Requirements for Emergencies," (pages B-11/12) provides a complete summary of minimum staffing requirements for emergencies, including on-shift and Capability for Additions staffing times. Table B-1 is provided using guidance in NUREG-0654/FEMA-REP-1,"Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Nuclear Power Plants." Address the following questions regarding Table B-1:

1. The Capability for Additions staffing times in Table B-1 of the LNP Emergency Plan are represented as a range of time, 30-45 min. and 60-75 min., respectively, versus 30 min. and 60 min. as stated in NUREG-0654/FEMA-REP-1. Provide Capabiltiy for Additions staffing times consistent with NUREG-0654 or explain why extended augmentation times are acceptable.

2. Table B-1 of the LNP Emergency Plan identifies a specific emergency response facility location for each major task and emergency position. Discuss why Table B-1 contains major tasks / emergency positions that would typically be associated with the OSC, however are identified as being located or executed out of the TSC (e.g., in-plant surveys performed by Radiological Control Team personnel out of the TSC.)

3. Table B-1 of the LNP Emergency Plan identifies several minimum staffing positions with footnotes indicating that these positions may be performed by shift personnel assigned other functions. For each of the following positions, identify

specifically who will be assigned the associated functions (e.g., Chemistry personnel performing First Aid activities) and provide a discussion of their respective collateral duties, including their ability to perform multiple roles with potentially competing priorities during an emergency situation: Mechanical Maintenance, Electrical/I&C Maintenance, First Aid and Rescue Operations personnel.

4. Table B-1 of the LNP Emergency Plan identifies the minimum shift staffing for Fire Fighting as consisting of 5 personnel per the FSAR. Provide a discussion regarding the specific team makeup of the Fire Brigade, including any collateral duties for each team member. Discuss how the fire brigade, with on-shift staffing, will be able to perform collateral duties if an emergency situation were to arise that warranted activation of the emergency response organization and fire brigade simultaneously.

5. Table B-1 identifies the Emergency Communicator function as being filled by plant personnel. Discuss who specifically will assume this function in the event of an emergency, including collateral duties and potentially competing priorities.

6. Provided that section 18.6.1 of Rev. 16 to the standard design certification for the AP1000 directs COL Applicants to discuss the staffing levels and qualifications of plant personnel, please discuss the staffing assumptions incorporated into Table B-1 for the new generation passive design reactor. Specifically, discuss the basis for not incorporating Instrument & Control (I&C) Maintenance and Information Technology personnel into Table B-1 of the LNP Emergency Plan as directed by section 18.6.1.

7. Table B-1 in the LNP Emergency Plan indicates that the STA will perform the technical support tasks on-shift at all times. However, footnote 1 provided in FSAR Table 13.1-202, "Minimum on-duty Operations Shift Organization for Two-Unit Plant," states the staffing may vary with one or more units in cold shutdown or refueling mode. In addition, Note (1) in Table 13.1-202 states that the shift manager or another SRO on shift may serve as the STA, as discussed further in NRC Generic Letter 86-04, "Policy Statement on Engineering Expertise on Shift." Consequently, there appears to be an inconsistency between the Emergency Plan and the FSAR. Please address this apparent inconsistency and discuss how the individual filling the SRO/STA combined position can handle the response tasks expected to be performed by an SRO and STA during an emergency.

8. Table B-1 in the LNP Emergency Plan indicates that there will be one each Health Physics and Chemistry Team Personnel on shift, per unit, at all times. However, Notes (4) and (5) in FSAR Table 13.1-202, "Minimum on-duty Operations Shift Organization for Two-Unit Plant," states that a radiation protection technician shall be on-site at all times when there is fuel in the reactor and a chemistry technician shall be on-site during plant operation in modes other than cold shutdown or refueling. Provided the minimum on shift staffing in Table B-1, discuss the need for Notes (4) and (5) in Table 13.1-202.

9. Table B-1 in the LNP Emergency Plan indicates that there will be two non-licensed operators (NLOs) on shift per unit, or four NLOs with both units operating. FSAR Table 13.1-202, "Minimum On-duty Operations Shift Organization for Two-Unit Plant," identifies the minimum number of NLOs as 4 whether or not one or two units are operating, unless all units are shutdown at which time only 3 NLOs would be required. Discuss the rationale for not having four NLOs as minimum staffing for one unit operating in Table B-1. Include in the discussion, the respective minimum staffing for Reactor Operators and Senior Reactor Operators as represented in FSAR Table 13.1-202 versus Table B-1.

10. Note (b) in Table B-1 in the LNP Emergency Plan states that one of the two non-licensed operators may be assigned to the Fire Brigade. The major task of Off-site Dose Assessment in Table B-1 contains this note. Discuss the rationale for this note as it pertains to Off-site Dose Assessment.

F. Appendix E to Part 50, "Emergency Planning and Preparedness for Production and Utilization Facilities," subsection IV.A, "Content of Emergency Plans – Organization," states that other licensee personnel, or other persons with special qualifications for coping with emergency conditions, such as consultants, who are not employees of the licensee, will be discussed with special qualifications described. Discuss why Section B.8, "Support from Contractor and Private Organizations, " (pages B-9/10) does not identify other employees of the licensee or consultants with special qualifications for coping with emergency conditions.

13.03-***

SITE-3: Requesting, using and accommodating emergency response support resources
Basis: 10 CFR 50.47(b)(3); NUREG-0654/FEMA-REP-1, Evaluation Criterion C.1.c; Evaluation Criterion C.4
SRP ACCEPTANCE CRITERIA: Requirement A; Acceptance Criterion 1

A. Section A.1.b.2, "State of Florida Department of Community Affairs, Division of Emergency Management (DEM)," (page A-2) states that the DEM provides personnel and equipment to emergency response facilities, and provides needed supplies to State and local political subdivisions. Provide a summary of licensee resources that would be made available to support Federal response (e.g., command posts, communications, etc.) and include the information in the LNP Emergency Plan.

13.03-***

SITE-6: Communication processes
Basis: 10 CFR 50.47(b)(6); 10 CFR 50.72(a)(4), NUREG-0654/FEMA-REP-1, Evaluation Criterion F.1; Evaluation Criterion F.1.a; Evaluation Criterion F.1.e
SRP ACCEPTANCE CRITERIA: Requirements A and F; Acceptance Criteria 1 and 29

A. Table F-2, “Interfacility/Organization Communications,” of the LNP Emergency Plan identifies “Note 1” however there is no corresponding note in the table. Provide a corresponding reference or remove the note reference in Table F-2 reference in the LNP Emergency Plan.

B. Section F.3, “Communication System Reliability,” (page F-4) states that quarterly communication tests are conducted between the LNP Control Rooms (CR), Technical Support Centers (TSC) and Emergency Operations Facility (EOF) to the NRC Headquarters Operations Center. Explain why the LNP CRs, TSCs and EOF communication test with NRC Headquarters is quarterly instead of monthly per Appendix E to Part 50.

13.03-***

SITE-7: Distribution of public information
Basis: 10 CFR 50.47(b)(7); 10 CFR 50, Appendix E.IV.D.2; NUREG-0654/FEMA-REP-1, Evaluation Criterion G.1; Evaluation Criterion G.2
SRP ACCEPTANCE CRITERIA: Requirements A and B; Acceptance Criteria 1 and 2

A. Section G.1, “Public Education and Information,” (Page G-1) of the LNP Emergency Plan provides a general discussion of the public education and information program. Provide a discussion in the LNP Emergency Plan regarding efforts to coordinate public education and information with the Crystal River 3 Plant (CR3), specifically in areas where the CR3 and LNP Emergency Planning Zones (EPZs) overlap.

13.03-***

SITE 8: Emergency facilities and equipment
Basis: 10 CFR 50.47(b)(8); 10 CFR 50, Appendix E.IV.E.3; Appendix E.IV.E.4; Appendix E.IV.E.8; Appendix E.VI Emergency Response Data System; Appendix E.VI. Maintaining Emergency Response Data System; Supplement 1 to NUREG-0737, “Clarification of TMI Action Plan Requirements,” NUREG-0654/FEMA-REP-1, Evaluation Criterion H.2; Evaluation Criterion H.4; Evaluation Criterion H.5; Evaluation Criterion H.6; Evaluation Criterion H.8; Evaluation Criterion H.9
SRP ACCEPTANCE CRITERIA: Requirements A and B; Acceptance Criteria 1, 2, 4, 5, 12, 25, and 26

A. Section H.2.1.c.6, “Emergency Equipment and Supplies,” (page H-6) of the LNP Emergency Plan states the Emergency Operations Facility (EOF) will receive radiological monitoring equipment from Health Physics if conditions warrant. Provide a discussion in the LNP Emergency Plan on radiation protection features and radiological monitoring systems that are available in the EOF, or provide a reference to the location of this information.

B. Clarify in the LNP Emergency Plan whether the EOF is an existing facility that will be shared by LNP and Crystal River 3 Plant (CR3). If shared, provide a discussion regarding the EOF and its capability to accommodate the response to simultaneous emergencies at LNP and CR3.

C. Section H.4, "Activation and Staffing of Emergency Response Facilities," (page H-7) states emergency response facilities are staffed and declared operational in accordance with emergency plan implementing procedures. Provide a discussion in the LNP Emergency Plan regarding the timely activation of emergency response facilities and centers (e.g., TSC operational within one hour) or justify why this information is not needed.

D. Section C.3, "Radiological Laboratories," states that radiological laboratories, their capabilities, and expected response times are listed in Table C-1, "Radiological Laboratories – Capabilities," (Page C-3) however no response times are included in the table. Clarify whether Table C-1 in the LNP Emergency Plan should include response times.

E. Section H.1.3, "Operations Support Centers," (OSC) (page H-4) establishes an OSC for each unit. Table H-1, "Typical Emergency Supplies Available for Emergency Facilities," (page H-11) provides a general list of emergency equipment supplies for an OSC. Discuss in the LNP Emergency Plan the process for establishing and maintaining emergency equipment inventory, including operational checks and availability of replacement equipment, or provide a reference for where this information can be found.

F. Section N.2 "Drills" states that Progress Energy tests communications with Federal emergency response organizations and states within the Ingestion Pathway EPZ quarterly. Section F.3, "Communication System Reliability," states that communications from the Control Rooms, TSCs, and the EOF to the NRC Headquarters Operations Center shall also be tested quarterly. Clarify whether the ERDS system will be tested quarterly and include a statement in the LNP Emergency Plan.

G. Section H, "Emergency Facilities and Equipment," (page H-2/6) provides for both an onsite TSC and an onsite OSC for each unit. Discuss the transfer of TSC functionality in the event that the TSC should become uninhabitable, or justify why this information is not needed.

13.03-***

SITE-9: Plant systems and instrumentation
Basis: 10 CFR 50.47(b)(9); NUREG-0654/FEMA-REP-1, Evaluation Criterion I.1; Evaluation Criterion I.2; Evaluation Criterion I.3; Evaluation Criterion I.4; Evaluation Criterion I.6; Evaluation Criterion I.10; Supplement 1 to NUREG-0737, Section 6.1.b.3. - Control Room Post-accident sampling capability
SRP ACCEPTANCE CRITERIA: Requirement A; Acceptance Criteria 1, 4, 5, 25, and 27

A. Section I.2, "Plant Monitoring Systems," discusses instruments that are available for determining parameters describing plant conditions during an accident. A general listing of types of instruments that comprise the radiation monitoring system (RMS) is presented in this section. Section I.2 references LNP FSAR Section 3.11, "Environmental Qualification of Mechanical and Electrical Equipment," which refers to Section 3.11 of the Design Control Document (DCD) for the AP1000. Section 3.11 states a list of the post-accident radiation monitoring equipment is provided in Table 7.5-1, "Post-Accident Monitoring System," of the DCD. Provide a general discussion of the

instrumentation to be used to measure and record key plant parameters and to display the information in the LNP control room.

B. Section I.4.2, "Off-Site Dose Assessment," states that offsite dose projections will be performed using NUREG-1741: RASCAL 3.0 as a technical basis. Explain the ability of this proposed method to provide reliable estimates that are representative for the Levy site. Include in your explanation how the proposed model will address site-specific source characteristics (e.g., source term, release heights, and building complex influence), local climatological effects (e.g., seasonal, diurnal, and terrain-induced flows), and local terrain impacts on plume trajectories.

13.03-***

SITE-10: Evacuation provisions and actions
Basis: 10 CFR 50.47(b)(10); 10 CFR 50, Appendix E.IV; NUREG-0654/FEMA-REP-1, Evaluation Criterion J.1; Evaluation Criterion J.2; Evaluation Criterion J.3; Evaluation Criterion J.5; Evaluation Criterion J.7
SRP ACCEPTANCE CRITERIA: Requirements A and B; Acceptance Criteria 1 and 2

A. Section J.1, "On-Site Notification," of the LNP Emergency Plan (page J-1) states that methods have been established to notify all individuals within the LNP site boundary, in a timely manner, of an emergency condition requiring individual action. Notifications would be made on the plant's public address system. Clarify, in the LNP Emergency Plan, the time required to warn or advise onsite individuals of an emergency.

B. Section J.2, "Evacuation Routes and Transportation," states that in the event of an evacuation, onsite personnel will be evacuated to a remote off-site assembly area. Provide additional information on the location of the remote off-site assembly area.

C. Discuss how the LNP Emergency Plan addresses emergency preparedness for security-based events as outlined in NRC Bulletin 2005-02, "Emergency Preparedness and Response Actions for Security-Based Events," dated July 18, 2005.

D. Section J.10, "Protective Measures Implementation," indicates that evacuation routes are illustrated in Figure A.6.2, "Levy Evacuation Routes and Shelters." Provide a discussion of evacuation plans for onsite individuals (e.g., employees, visitors, contractors) during inclement weather or high traffic density.

E. Section J.2, "Evacuation Routes and Transportation," (page J-2) states that evacuating personnel may be monitored through portal monitors as they leave the protected area or by portable friskers in the evacuation monitoring area. If conditions warrant, they will assemble at an offsite area until remote monitoring stations are established. Provide the locations of remote assembly areas and county monitoring stations or a discussion of the process that will be used to identify them.

13.03-***

SITE-12: Medical services for Levy Nuclear Plant workers and contaminated injured individuals

Basis: 10 CFR 50.47(b)(12); 10 CFR 50, Appendix E.IV.E.7; NUREG-0654/FEMA-REP-1, Evaluation Criterion L.1; Evaluation Criterion L.2
SRP ACCEPTANCE CRITERIA: Requirements A and B; Acceptance Criteria 1 and 2

A. Table L-1, "Summary of Actions for Emergency Medical Treatment," provides a summary of actions to be taken for non-contaminated and contaminated personnel with injuries. Clarify the actions to be taken by onsite personnel in the event of an injury such that the actions are clear as to who is to be notified and where the injured personnel are to be transported and treated for their respective injury.

B. Section L.1, "Hospital and Medical Support," identifies agreements with Seven Rivers Regional Medical Center and Citrus Memorial Hospital to provide medical services to radiological and non-radiological injuries that require treatment offsite. Clarify whether REAC/TS should also be listed in Table L-1. If so, modify Table L-1 in the LNP Emergency Plan.

13.03-***

SITE-15: Training program for emergency responders, instructors and directors and coordinators
Basis: 10 CFR 50.47(b)(15); 10 CFR 50, Appendix E.IV. F.1, Appendix E.IV. F.2.g; NUREG-0654/FEMA-REP-1, Evaluation Criterion O.1.a; Evaluation Criterion O.2; Evaluation Criterion O.3; Evaluation Criteria O.4.a through O.4.j; Evaluation Criterion O.5
SRP ACCEPTANCE CRITERIA: Requirements A and B; Acceptance Criteria 1 and 2

A. Section N.4, "Exercise and Drill Evaluation," states that a critique will be conducted as soon as practicable following each exercise with a formal evaluation resulting from the critique. Clarify whether critiques also apply to drills and discuss whether or not the results are factored into initial training and retraining of personnel, if warranted.

13.03-***

SITE-17: Evaluation Against the SRP
Basis: 10 CFR 52.79(a)(41) and 10 CFR 50.34(h)
SRP Acceptance Criteria: Requirement A; Acceptance Criteria 1 and 11

A. Table 1.9-202, "Conformance with SRP Acceptance Criteria," in Part 2 of the COL Application indicates that the Section 13.3, "Emergency Planning," is acceptable from a design certification perspective. However, the SRP Acceptance Criteria related to Emergency Planning in Section 13.3 of the NUREG-0800, Standard Review Plan," (SRP) were not evaluated against the content of Part 5, "Emergency Plan," of the COL Application. Identify all differences between the LNP Emergency Plan and SRP Chapter 13.3, "Emergency Planning." Where differences exist, discuss how the proposed alternative provides an acceptable method of complying with applicable regulations, or portions of the regulations.

13.03-***

SITE-18: COL Information Items
Basis: 10 CFR 50.47 and Appendix E to 10 CFR Part 50
SRP Acceptance Criteria: Requirements A and B; Acceptance Criteria 1 and 2

A. COL Action Item 13.3-1 in NUREG-1793, "Final Safety Evaluation Report Relating to Certification of the AP1000 Standard Design," states in part that the COL applicants that reference the AP1000 certified design will address communication interfaces associated with the TSC. Explain why this aspect of the COL Action Item was not captured in STD COL 13.3-1.

B. COL Action Item 13.3.3.3.5-1 in NUREG-1793, "Final Safety Evaluation Report Relating to Certification of the AP1000 Standard Design," states: "Combined license applicants referencing the AP1000 certified design will address activation of the emergency operations facility consistent with current operating practice and NUREG-0654/FEMA-REP-1." Section 13.3, "Emergency Planning," of Part 2 of the FSAR states in STD COL 13.3-2 states: "The emergency plan describes the plans for coping with emergency situations, including communication interfaces and staffing of the emergency operations facility." Discuss the relationship between the two Information Items. For example, while COL Action Item 13.3.3.3.5-1 addresses activation of the emergency operations facility, STD COL 13.3-2 addresses staffing and communication interfaces of the emergency operations facility.

13.03-***

SITE-19: Plume Exposure EPZ
Basis: 10 CFR 50.33(g), 10 CFR 52.77 and 10 CFR 50.47(c)
SRP ACCEPTANCE CRITERIA: Requirement A; Acceptance Criterion 10

A. Section 1.3, “Emergency Planning Zones,” in Part 5, “Emergency Plan,” describes the plume exposure pathway and ingestion exposure pathway emergency planning zones (EPZs). Discuss in the LNP Emergency plan whether the exact sizes and configurations of the EPZs surrounding LNP were determined in relation to the local emergency response needs and capabilities as they are affected by such conditions as demography, topography, land characteristics, access routes, and jurisdictional boundaries.