## Bell Bend Nuclear Power Plant Draft Requests for Additional Information April 20, 2009

RAI Number	RAI Description	RAI For
BBNPP - 001	Subject: KI use for the public Basis: NUREG-0654, Evaluation Criterion J.10.f SRP ACCEPTANCE CRITERION: Requirement H	
	A. Pennsylvania  PA State Plan, Annex E, Appendix 5, Radiological Exposure Control, Section 6.C, and Attachment B, Section 3.B.2, state that "KI should be taken only at the direction from the State of Pennsylvania. The projected dose that triggers this advice is 25 rem CDE to the adult thyroid." This is inconsistent with the BRP-ER-A-7.0 criteria of when a General Emergency is declared OR at a projected child thyroid committed dose equivalent of 5 rem. Please provide amended plan information that is consistent with BRP guidance.	PA
·	B. Risk County radiological emergency response plans, Appendix 13, <i>Radiological Exposure Control</i> , Section 6.C, state that "KI should be taken only at the direction from the State of Pennsylvania. The projected dose that triggers this advice is 25 rem CDE to the adult thyroid." This is inconsistent with the BRP-ER-A-7.0 criteria of when a General Emergency is declared OR at a projected child thyroid committed dose equivalent of 5 rem. Please provide amended plan information that is consistent with BRP guidance.	Luzerne Columbia

RAI Number	RAI Description	RAI For
BBNPP - 002	Subject: FRMAC location Basis: NUREG-0654, Evaluation Criterion C.1.c SRP ACCEPTANCE CRITERION: Requirement H  A. Pennsylvania:  PA State Plan, Annex E, Appendix 23, states that formal agreements are pending to locate the FRMAC at the Ashley U.S. Army Reserve Center and the DFO at the Kingston Armory. Please provide information on the final arrangements for the location of the FRMAC.  B. Risk Counties:	PA
	The PA State plan says that the county EMAs who provide support to the Federal response are to cooperate with the Federal government and PEMA in planning for and making the necessary support arrangements; however, the Risk County plans do not contain reciprocal language acknowledging that the counties are responsible for assisting with support arrangements for Federal agencies. Please provide Risk County plan information acknowledging the statement in the PA State plan that the counties may be called upon to provide resources to support the Federal response.	Columbia Luzerne
	C. Support Counties:  The PA State plan says that the county EMAs who provide support to the Federal response are to cooperate with the Federal government and PEMA in planning for and making the necessary support arrangements; however, the Support County plans do not contain reciprocal language acknowledging that the counties are responsible for assisting with support arrangements for Federal agencies. Please provide Support County plan information acknowledging the statement in the PA State plan that the counties may be called upon to provide resources to support the Federal response.	Lackawanna Lycoming Montour Northumberland Schuylkill Union Wyoming

RAI Number	RAI Description	RAI For
BBNPP - 003	Subject: Dosimeter correction factor Basis: NUREG-0654, Evaluation Criterion K.3.a SRP ACCEPTANCE CRITERION: Requirement H  A. Pennsylvania	
	A.1. PA State Plan, Annex E, Appendix 5, Radiological Exposure Control, Attachment B Dosimetry and Potassium Iodide (KI), Section 4, Emergency Worker Exposure Control, A(4)d, acknowledges that internal exposure cannot be measured on a DRD or TLD and must be accounted for using a correction factor. The plans indicate that the BRP will calculate a dosimeter correction factor and modify exposure limits, as appropriate; however, procedures for these calculations were not included in the material provided for review. Please provide plan material explaining dose correction calculations.	PA
	A.2. BRP-ER-A-7.0, <i>Protective Response</i> , Section 7.5.2 <i>Emergency Worker Exposure Control</i> , acknowledges that internal exposure cannot be measured on a DRD or TLD and must be accounted for using a correction factor. The plans indicate that the BRP will calculate a dosimeter correction factor and modify exposure limits, as appropriate; however, procedures for these calculations were not included in the material provided for review. Please provide plan material explaining dose correction calculations.	BRP
BBNPP - 004	Subject: MS-1 hospitals Basis: NUREG-0654, Evaluation Criterion L.1 SRP ACCEPTANCE CRITERION: Requirement H  A. Pennsylvania  PA State Plan, Annex E, Appendix 11, Attachment A, List of Designated MS-1 Hospitals Capable of Evaluation and Emergency Treatment of Contaminated Individuals identifies four MS-1 hospitals serving SSES. This list is inconsistent with the Luzerne and Columbia County plans. Please update the PA State plan to show the correct MS-1 hospitals and their capacities.	PA

RAI Number BBNPP	RAI Description Subject: Hospital and EMS support facilities	RAI For
- 005	Basis: NUREG-0654, Evaluation Criterion L.3 SRP ACCEPTANCE CRITERION: Requirement H	
	A. Pennsylvania  PA State Plan, Annex E, Appendix 11, Attachment J,	PA
	Hospitals Serving in a General capacity to the Susquehanna Steam Electric Station, says that a listing of hospitals capable of providing medical support for contaminated injured individuals is found in the Pennsylvania Department of Health; a copy of the directory is maintained in the State and Risk County EOCs. This list was not provided for review. Please provide the list of hospitals and EMS organizations capable of providing medical support for contaminated injured individuals.	
	B. Risk Counties  The Risk County radiological emergency response plans, Appendix 7, Attachment F Hospitals Serving in General Support, state that general support hospitals around SSES capable of providing medical support for contaminated injured individuals are included on a list that is maintained in the EOC. This list was not provided for review. Please provide the list of hospitals and EMS organizations capable of providing medical support for contaminated injured individuals.	Luzerne Columbia

RAI Number	RAI Description	RAI For
BBNPP - 006	Subject: Contamination action levels Basis: NUREG-0654, Evaluation Criterion K.5.a SRP ACCEPTANCE CRITERION: Requirement H	
	A. Pennsylvania	
	<ul> <li>A.1. PA State Plan, Annex E, Appendix 5, Radiological Exposure Control, Section 4.F, Monitoring/ Decontamination Teams, specifies 1000 counts per minute including background for GM pancake probes action level. This contradicts the FEMA-REP-22 guidance for loose contamination, and the 300 counts per minute action level given in the county plans and BRP-ER-A-7.4.4, Protective Response, Surface Contamination Control.</li> <li>A.2 PA State Plan, Annex E, Appendix 5, Radiological Exposure Control, Attachment A, Section 2.G(8), Monitoring Procedures for Vehicles, says to consider vehicles contaminated if any of the readings are greater than 1000 counts per minute with a Geiger-Mueller Beta/Gamma pancake probe. This contradicts the FEMA-REP-22 guidance for loose contamination, and the 300 counts per minute action level given in the county plans and BRP-ER-A-7.4.4, Protective</li> </ul>	PA PA

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RAI .		RAI
Number	RAI Description	For
BBNPP	Subject: Portal monitor use	
- 007	Basis: NUREG-0654, Evaluation Criterion K.5.a	
	SRP ACCEPTANCE CRITERION: Requirement H	
	A. Pennsylvania	
	A.1. PA State Plan, Annex E, Appendix 5, Radiological Exposure Control, Section 4.F,  Monitoring/Decontamination Teams; Section 9.X,  Definitions, and Attachment A, Section 2.G,  Monitoring Procedures for Vehicles, all indicate that portal monitors may be used to monitor vehicles. This is contrary to PEMA Emergency Management  Guidance and Information Circular, "Contamination Monitoring and Decontamination Guidance for Radiological Emergency Response", (No.: C2004-2).  Please provide amended plan pages clarifying that portal monitors may not be used to monitor vehicles.	PA
	A.2 PA State Plan, Annex E, Appendix 5, Radiological Exposure Control, does not include a procedure to source check the portal monitors used at monitoring and decontamination centers. Please provide procedures for source checking portal monitors in accordance with FEMA-REP-21.	PA
	B. Risk Counties	
	The Risk County radiological emergency response plans, Appendix 13, Radiological Exposure Control, Attachment A, Monitoring and Decontamination Procedures, do not include a procedure to source check the portal monitors used at monitoring and decontamination centers. Please provide procedures for source checking portal monitors in accordance with FEMA-REP-21.	Luzerne Columbia

RAI Number	RAI Description	RAI For
BBNPP - 008	Subject: Emergency Classification Levels Basis: NUREG-0654, Evaluation Criterion D.3 SRP ACCEPTANCE CRITERION: Requirement H  A. Pennsylvania  PA State Plan, Annex E, Section 13, Definitions and Terms, describes Emergency Classification Levels that are not consistent with those in the Applicant's plan. The PA State plan does not include the security threat language. Please provide amended Emergency Classification Levels that are consistent with those established by the Applicant.  B. Risk County	PA
	Columbia County Radiological Emergency Response Plan, Enclosure 4 Emergency Response Action Guidelines for the Four Classes of Incidents, describes Emergency Classification Levels that are not consistent with those in the Applicant's plan. The Columbia County plan does not include the security threat language. Please provide amended Emergency Classification Levels that are consistent with those established by the Applicant.	Columbia

RAI		RAI	,
Number	RAI Description	For	
BBNPP - 009	Subject: Dose limits during re-entry activities Basis: NUREG-0654, Evaluation Criterion M.1 SRP ACCEPTANCE CRITERION: Requirement H		
	A. Pennsylvania		
·	A.1. PA State Plan, Annex E, Appendix 15, Return and Recovery, incorrectly characterizes reentry activities as "emergency" activities and consequently specifies the wrong dose limits. EPA states [in Section 4.6 of the Manual of Protective Action Guides and Protective Actions for Nuclear Incidents (EPA 400-R-92-001)] that individuals who enter the restricted zone should have their doses controlled in accordance with occupationally-exposed worker limits (i.e., those found in 10CFR20.1201 Occupational Dose Limits for Adults). Please provide amended plan pages showing correct dose limits during reentry activities.	PA	
,	A.2 BRP-ER-A-8.03 Reentry, Return, Relocation, and Recovery Procedure, incorrectly characterizes reentry activities as "emergency" activities and consequently specifies the wrong dose limits. EPA states [in Section 4.6 of the Manual of Protective Action Guides and Protective Actions for Nuclear Incidents (EPA 400-R-92-001)] that individuals who enter the restricted zone should have their doses controlled in accordance with occupationally-exposed worker limits (i.e., those found in 10CFR20.1201 Occupational Dose Limits for Adults). Please provide amended plan pages showing correct dose limits during reentry activities.	BRP	
	(RAI continued next page)		

RAI Number	RAI Description	RAI For
(BBNPP – 009 cont'd)	The Risk County radiological emergency response plans, Appendix 16, Recovery (Re-entry, Return, and Relocation), incorrectly characterize reentry activities as "emergency" activities and consequently specify the wrong dose limits. EPA states [in Section 4.6 of the Manual of Protective Action Guides and Protective Actions for Nuclear Incidents (EPA 400-R-92-001)] that individuals who enter the restricted zone should have their doses controlled in accordance with occupationally-exposed worker limits (i.e., those found in 10CFR20.1201 Occupational Dose Limits for Adults). Please provide amended plan pages showing correct dose limits during reentry activities.	Luzerne Columbia
BBNPP - 010	Subject: KI inventory maintenance Basis: NUREG-0654, Evaluation Criterion J.10.e SRP ACCEPTANCE CRITERION: Requirement H  A. Pennsylvania  A.1. PA State Plan, Annex E, Appendix 5 Radiological Exposure Control, Section 4, states that PEMA will specify implementation of comprehensive inventory maintenance programs for KI. The storage guidelines and replacement procedures for KI are not provided. Please provide KI storage guidelines and replacement procedures.	PA

RAI Number	RAI Description	RAI For
BBNPP - 011	Subject: Mass care planning basis Basis: NUREG-0654, Evaluation Criterion J.12 SRP ACCEPTANCE CRITERION: Requirement H  A. Risk Counties  The Risk County plans, Appendix 12 Mass Care Section 4 Requirements Part A says that the appendix is based upon the assumption that 30 percent of the evacuees will need mass care services. Section 4 Part C says the county has assumed that 20 percent of the evacuees will require mass care space. Please provide plan material explaining the rationale for the difference in the planning basis between the two sections, or provide amended plan material using the same planning basis.	Luzerne Columbia

RAI Number	RAI Description	RAI For
BBNPP - 012	Subject: Post-decontamination monitoring Basis: NUREG-0654, Evaluation Criterion K.5.a SRP ACCEPTANCE CRITERION: Requirement H  A. Risk Counties  Risk County Plans, Appendix 13 Radiological Exposure Control, allows for a final post decontamination survey be conducted using a portal monitor. This is not consistent with the intent of FEMA REP-21 and 22; per FEMA guidance, the portal monitor is intended to screen individuals who have not bathed and changed prior to monitoring (as a distribution of fixed and removable contamination is factored into the 1 microcurie portal monitor sensitivity requirement). Please provide amended	Luzerne Columbia
	plan information indicating that the primary post-decontamination monitoring will be conducted using an appropriate hand-held instrument.  B. Support Counties (except Montour)  Support County Plans (except Montour), Appendix 4, Attachment F, Tab D Post Decontamination Monitoring using Portal Monitors of Individuals found to be Contaminated, allows for a final post decontamination survey be conducted using a portal monitor. This is not consistent with the intent of FEMA REP-21 and 22; per FEMA guidance, the portal monitor is intended to screen individuals who have not bathed and changed prior to monitoring (as a distribution of fixed and removable contamination is factored into the 1 microcurie portal monitor sensitivity requirement). Please provide amended plan information indicating that the primary post-decontamination monitoring will be conducted using an appropriate hand-held instrument.	Lackawanna Lycoming Northumberland Schuylkill Union Wyoming

RAI Number	RAI Description	RAI For
BBNPP - 013	Subject: Medical transportation providers Basis: NUREG-0654, Evaluation Criterion L.4	
- 013	SRP ACCEPTANCE CRITERION: Requirement H	
	A. Risk Counties	
	The Risk County plans, Appendix 9, Attachment A, <i>Transportation Resources</i> , state that the list of medical transportation providers is on file at the EOC, but the list was not provided for review. Please provide the list of medical transportation providers, as well as the appropriate LOAs with the providers or a statement that the provider's services are ensured through Title 35.	Luzerne Columbia

RAI Number	RAI Description	RAI For
BBNPP - 014	Subject: LOAs with transportation providers Basis: NUREG-0654, Evaluation Criterion A.3 SRP ACCEPTANCE CRITERION: Requirement H  A. Risk Counties	
	A.1 Luzerne County RERP, Appendix 20, Agreements and Statements of Understanding, includes descriptions of 14 agreements with transportation providers. Of the 14, the supplemental COLA information (BNP-2008-009 Attachment 4 – Luzerne County – A4 through A16) indicates that 8 are out of business; no copy of the agreements could be obtained for 5 companies, and there was no information on the remaining 1 agreement. There is no documentation that any of Luzerne County's agreements for transportation are valid. Please provide current, valid agreements for transportation in Luzerne County.	Luzerne
	A.2 Columbia County RERP, Appendix 20, Agreements and Statements of Understanding, includes a description of an agreement with 1 transportation provider. The supplemental COLA information (BNP-2008-009 Attachment 3 – Columbia County – A7 and A8) contains agreements with two transportation companies dated over 10 years ago. Furthermore, the description in Appendix 20 does not match either of the agreements provided. Please provide current agreements for transportation in Columbia County and amend the agreement descriptions in Appendix 20 accordingly.	Columbia

RAI Number	RAI Description	RAI For
BBNPP - 015	Subject: Alert and activation of response organization Basis: NUREG-0654, Evaluation Criterion E.2 SRP ACCEPTANCE CRITERION: Requirement H	
	A. Pennsylvania	
	The Pennsylvania State Emergency Operations Plan, Annex E, Section 4 Concept of Operations, G State Emergency Operations Center (EOC) Notification Procedures says that detailed procedures for the alert and activation of the emergency response personnel are contained in the State EOC Standard Operating Procedures (SOP) and departmental implementing procedures, but these documents were not provided for review: Please provide these documents for review.	PA
	B. Risk Counties	
	B.1 The Luzerne County RERP, Enclosures 5 and 6, state that the Luzerne County Resource Manual contains implementing procedures for alert and activation of the emergency response personnel, but the Resource Manual was not provided for review: Please provide the Luzerne County Resource Manual for review.	Luzerne
	B.2 The Columbia County RERP, Enclosures 5 and 6, state that the Columbia County Plan call out list and Risk Municipality emergency management organizations list are maintained in the Columbia County EOC for alert and activation of the emergency response personnel, but the these documents were not provided for review: Please provide the Columbia County Plan call out list and Risk Municipality emergency management organizations list for review.	Columbia
	C. Support Counties	Lackawanna
	The support county Emergency Operations Plan specifies that the emergency response may be activated by the Emergency Management Coordinator, but it does not provide procedures for this activation. Please provide the activation procedures.	Lycoming Montour Northumberland Schuylkill Union Wyoming

RAI		RAI
Number	RAI Description	For
BBNPP - 016	Subject: Siren design objective Basis: NUREG-0654, Evaluation Criterion E.6 SRP ACCEPTANCE CRITERION: Requirement H	
	A. Pennsylvania	
	The PA State Plan, Annex E, Appendix 3 <i>Public Alert and Notification</i> , Sections 2 through 4 say the design objective for siren coverage within 5 miles of the plant is 90%. However, NUREG 0654/FEMA REP-1, Rev 1., Appendix 3, states that the design objective for the initial notification system will ensure direct coverage of essentially 100% of the population within 5 miles of the site. Please provide amended plan pages showing siren design objectives consistent with NUREG guidance.	PA
BBNPP - 017	Subject: Sample EAS messages Basis: NUREG-0654, Evaluation Criterion E.7 SRP ACCEPTANCE CRITERION: Requirement H	
	A. Pennsylvania  The Pennsylvania State Emergency Operations Plan, Annex E, Appendix 16 Public Education and Information, contains draft initial EAS messages, but it does not contain draft message providing specific protective actions to be taken such as information on the use of KI or agricultural advisories. Please provide these additional draft messages.	PA
;	B. Risk Counties	
	The Risk County RERPS, Appendix 4, <i>Public Information</i> , contain draft initial EAS messages, but it does not contain draft message for agricultural advisories (referenced in Risk County plans Appendix 15). Please provide these additional draft messages.	Luzerne Columbia

RAI Number	RAI Description	RAI For
BBNPP - 018	Subject: Training for accident assessment personnel Basis: NUREG-0654, Evaluation Criterion O.4.b	
- 010	SRP ACCEPTANCE CRITERION: Requirement H	
	A. Pennsylvania	
	A.1 The Pennsylvania State Emergency Operations Plan, Annex E, Appendix 17, Training, Attachment A, Listing of Approved Training Programs provides information on Federal, State, county, and licensee training courses; however, it does not specify which courses and other training requirements are necessary for accident assessment personnel. Please provide specific training requirements for accident assessment personnel.	PA
	A.2 BRP Procedures do not provide specific training requirements for individuals tasked with accident assessment responsibilities. Please provide specific training requirements for accident assessment personnel.	BRP

RAI Number	RAI Description	RAI For
BBNPP - 019	Subject: Training for field monitoring teams Basis: NUREG-0654, Evaluation Criterion O.4.c SRP ACCEPTANCE CRITERION: Requirement H	
	A.1 The Pennsylvania State Emergency Operations Plan, Annex E, Appendix 17, Training, Attachment A, Listing of Approved Training Programs provides information on federal, state, county, and licensee training courses; however, it does not specify which courses and other training requirements are necessary for radiological monitoring teams (field survey teams) and analysis personnel. Please provide specific training requirements for radiological monitoring teams (field survey teams) and analysis personnel.	PA
	A.2 BRP-ER-A-6.01 Field Team Operations does not include specifics training requirements for radiological monitoring team personnel or analysis personnel. Please provide specific training requirements for radiological monitoring teams (field survey teams) and analysis personnel.	BRP

RAI Number	RAI Description	RAI For
BBNPP - 020	Subject: Training for emergency information personnel Basis: NUREG-0654, Evaluation Criterion O.4.j SRP ACCEPTANCE CRITERION: Requirement H	
	A. Pennsylvania  The Pennsylvania State Emergency Operations Plan, Annex E, Appendix 17, <i>Training</i> , states that personnel responsible for transmission of emergency information will receive training; however, the plans do not describe the content of training. Please provide information describing training for personnel responsible for transmission of	PA
	B. Risk Counties  The Risk County RERPs do not address training for personnel responsible for transmission of emergency information. Please provide information describing training for personnel responsible for transmission of emergency information.	Luzerne Columbia
BBNPP - 021	Subject: Annual retraining of emergency response personnel Basis: NUREG-0654, Evaluation Criterion O.5 SRP ACCEPTANCE CRITERION: Requirement H  A. Pennsylvania  The Pennsylvania State Emergency Operations Plan, Annex E, Appendix 17, Training, does not address annual retraining of State emergency response personnel. Please provide plan information addressing annual retraining of State emergency response personnel.	PA

RAI Number	RAI Description	RAI For
BBNPP - 022	Subject: Equipment check frequency Basis: NUREG-0654, Evaluation Criterion H.10 SRP ACCEPTANCE CRITERION: Requirement H  A. Pennsylvania  The Pennsylvania State Emergency Operations Plan, Annex E, Appendix 5, Radiological Exposure Control, Attachment C, Inventory and Maintenance Procedures specifies annual, rather than quarterly checks of equipment (other than communications equipment). Please provide amended plan pages specifying quarterly checks of equipment.	PA
	<ul> <li>B. Risk Counties</li> <li>Each Risk County RERP, Appendix 13 Radiological Exposure Control, Attachment C Inventory and Maintenance Procedures specifies annual, rather than quarterly checks of equipment (other than communications equipment). Please provide amended plan pages specifying quarterly checks of equipment.</li> <li>C. Support Counties</li> </ul>	Luzerne Columbia
	Each Support County RERP, Appendix 5 Inventory and Maintenance Procedures specifies annual, rather than quarterly checks of equipment (other than communications equipment). Please provide amended plan pages specifying quarterly checks of equipment.	Lackawanna Lycoming Northumberland Schuylkill Union Wyoming

RAI Number	RAI Description	RAI For
BBNPP - 023	Subject: Training of individuals responsible for planning Basis: NUREG-0654, Evaluation Criterion P.1 SRP ACCEPTANCE CRITERION: Requirement H	
	A. Pennsylvania  The Pennsylvania State Emergency Operations Plan, Annex E Appendix 17 <i>Training</i> , does not specify whether individuals responsible for the planning effort are required to attend specific training courses such as those described in Appendix 17. Please provide information on training requirements for individuals responsible for the planning effort.	PA
	B. Risk Counties  The Risk County RERPs, Section 6 Organization and Responsibilities, B do not specify whether individuals responsible for the planning effort are required to attend specific training courses such as those described in Appendix 17 of the PA State plan. Please provide information on training requirements for individuals responsible for the planning effort.  (RAI continued next page)	Luzerne Columbia

RAI		RAI
Number	RAI Description	For
(BBNPP – 023 cont'd.)	C. Risk Municipalities  The Risk County Municipality RERPs, Section VII Training and Exercises do not specify whether individuals responsible for the planning effort are required to attend specific training courses such as those described in Appendix 17 of the PA State plan. Please provide information on training requirements for individuals responsible for the planning effort.	Black Creek Twp Butler Twp/ Conyngham Bor Conyngham Twp Dorrance Twp Hollenback Twp Hunlock Twp Huntington Twp/ New Columbus Bor Nanticoke City Nescopeck Bor Nescopeck Twp Newport Twp Nuangola Bor Salem Twp Shickshinny Bor Slocum Twp Sugarloaf Twp Union Twp ———— Beaver Twp Berwick/Briar Crk Bor Briar Creek Twp Mifflin Twp North Centre Twp South Centre Twp
	D. Support Counties	
	The Support County RERPs do not contain any information on whether individuals responsible for the planning effort are required to attend specific training courses such as those described in Appendix 17 of the PA State plan. Please provide information on training requirements for individuals responsible for the planning effort.	Lackawanna Lycoming Montour Northumberland Schuylkill Union Wyoming

RAI Number	RAI Description	RAI For
BBNPP - 024	Subject: Plan update frequency Basis: NUREG-0654, Evaluation Criterion P.4 SRP ACCEPTANCE CRITERION: Requirement H	
	A. Risk Municipalities  Risk Municipality plans, Section IX Plan Changes and Distribution, A.1 do not specifically state that the agreements will be re-certified annually. Please provide information on annual re-certification of agreements.	Black Creek Twp Butler Twp/ Conyngham Bor Conyngham Twp Dorrance Twp Hollenback Twp Hunlock Twp Huntington Twp/ New Columbus Bor Nanticoke City Nescopeck Bor Nescopeck Twp Newport Twp Nuangola Bor Salem Twp Shickshinny Bor Slocum Twp Sugarloaf Twp Union Twp ———— Beaver Twp Berwick/Briar Crk Bor Briar Creek Twp Fishing Creek Twp Mifflin Twp North Centre Twp South Centre Twp
	B. Support Counties	
	Lackawanna, Northumberland, and Union Counties, County Support Procedure, <i>Annex Maintenance and Concurrence</i> , state that they will update their plans at least biennially, rather than annually as required by Criterion P.4. Please provide amended plan pages stating that plans will be updated at least annually.	Lackawanna Northumberland Union

RAI Number BBNPP - 025	RAI Description  Subject: Plan changes and distribution  Basis: NUREG-0654, Evaluation Criterion P.5  SRP ACCEPTANCE CRITERION: Requirement H	RAI For
	Risk Municipality plans, Section IX Plan Changes and Distribution do not describe a method to make changes other than during the annual review/ distribution. Please provide information describing the method used to make changes other than during the annual review/distribution.	Black Creek Twp Butler Twp/ Conyngham Bor Conyngham Twp Dorrance Twp Hollenback Twp Hunlock Twp Huntington Twp/ New Columbus Bor Nanticoke City Nescopeck Bor Nescopeck Twp Newport Twp Nuangola Bor Salem Twp Shickshinny Bor Slocum Twp Sugarloaf Twp Union Twp ———— Beaver Twp Berwick/Briar Crk Bor Briar Creek Twp Mifflin Twp North Centre Twp South Centre Twp

RAI		RAI
Number	RAI Description	For
BBNPP - 026	Subject: Listing of supporting plans Basis: NUREG-0654, Evaluation Criterion P.6 SRP ACCEPTANCE CRITERION: Requirement H	The state of the s
	A. Risk Municipalities  Risk Municipality plans do not include a listing of supporting plans. Please provide a listing of supporting plans.	Black Creek Twp Butler Twp/ Conyngham Bor Conyngham Twp Dorrance Twp Hollenback Twp Hunlock Twp Huntington Twp/ New Columbus Bor Nanticoke City Nescopeck Bor Nescopeck Twp Newport Twp Nuangola Bor Salem Twp Shickshinny Bor Slocum Twp Sugarloaf Twp Union Twp ————————————————————————————————————
	B. Support Counties	Mo.
	Risk Municipality plans and Support County plans do not include a listing of supporting plans. Please provide a listing of supporting plans.	Lackawanna Lycoming Montour Northumberland Schuylkill Union Wyoming

RAI Number	RAI Description	RAI For
BBNPP - 027	Subject: Implementing procedure listings Basis: NUREG-0654, Evaluation Criterion P.7 SRP ACCEPTANCE CRITERION: Requirement H	
	A. Pennsylvania	
	The Pennsylvania State Emergency Operations Plan, Appendix 22 Supporting Plans and Implementing Procedures includes a listing of procedures required to implement the plan. The referenced listings do not include the sections(s) of the plan to be implemented by each procedure. Please provide updated plan procedure listing pages showing the sections(s) of the plan to be implemented by each procedure.	PA
	B. Risk Counties	
	The Risk County RERPs, Appendix 21 Supporting Plans and Implementing Procedures, include a listing of procedures required to implement the plan. The referenced listings do not include the sections(s) of the plan to be implemented by each procedure. Please provide updated plan procedure listing pages showing the sections(s) of the plan to be implemented by each procedure.	Luzerne Columbia
	(RAI continued next page)	

RAI		RAI
Number	RAI Description	For
(BBNPP – 027 cont'd)	The Risk Municipality RERPs, Section X Standard Operating Procedures include a listing of procedures required to implement the plan. The referenced listings do not include the sections(s) of the plan to be implemented by each procedure. Please provide updated plan procedure listing pages showing the sections(s) of the plan to be implemented by each procedure.	Black Creek Twp Butler Twp/ Conyngham Bor Conyngham Twp Dorrance Twp Hollenback Twp Hunlock Twp Huntington Twp/ New Columbus Bor Nanticoke City Nescopeck Bor Nescopeck Twp Newport Twp Nuangola Bor Salem Twp Shickshinny Bor Slocum Twp Sugarloaf Twp Union Twp ———— Beaver Twp Berwick/Briar Crk Bor Briar Creek Twp Mifflin Twp North Centre Twp South Centre Twp

RAI Number	RAI Description	RAI For
BBNPP - 028	Subject: Quarterly update of phone numbers Basis: NUREG-0654, Evaluation Criterion P.10 SRP ACCEPTANCE CRITERION: Requirement H	
,	A. Pennsylvania	
	The Pennsylvania State Emergency Operations Plan, Annex E, Section 4 Concept of Operations, G State Emergency Operations Center (EOC) Notification Procedures references notification procedures (these were not provided for review) and does not specify that telephone numbers/call down lists will be updated quarterly. Please provide plan pages showing that telephone numbers/call down lists and maps will be updated quarterly.	PA
	B. Risk Counties	
	B.1 The Luzerne County Plan does not address the updating of maps. Please provide plan pages showing that maps will be updated quarterly.	Luzerne
	B.2 The Columbia County RERP, Enclosures 5 and 6, says that the telephone numbers and call down list is updated as necessary (no frequency is specified). The plan does not address the updating of maps. Please provide plan pages showing that telephone numbers/call down lists and maps will be updated quarterly.	Columbia
	(RAI continued next page)	

RAI		RAI
Number	RAI Description	For
(BBNPP – 028	C. Risk Municipalities	
cont'd)	C.1 The Risk Municipality plans, Section XI Notification and Resource Manual, Annex A, Emergency Notification List, say that the call down lists are updated annually. The plans do not address the updating of maps. Please provide plan pages showing that telephone numbers/call down lists and maps will be updated quarterly.	Black Creek Twp Butler Twp/ Conyngham Bor Conyngham Twp Dorrance Twp Hollenback Twp Hunlock Twp Huntington Twp/ New Columbus Bor Nanticoke City Nescopeck Bor Nescopeck Twp Newport Twp Nuangola Bor Salem Twp Shickshinny Bor Slocum Twp Sugarloaf Twp Union Twp ————— Beaver Twp Berwick/Briar Crk Bor Briar Creek Twp Mifflin Twp North Centre Twp South Centre Twp
	C.2 Nescopeck Township Plan, Annex A <i>Emergency</i> Notification List did not designate anyone to fill the key position of emergency management coordinator or deputy coordinator.	Nescopeck Twp
	D. Support Counties	
	Support County plans do not provide information for updating telephone numbers and call down lists or the updating of maps. Please provide plan pages showing that telephone numbers/call down lists and maps will be updated quarterly.	Lackawanna Lycoming Montour Northumberland Schuylkill Union Wyoming

RAI Number	RAI Description	RAI For
BBNPP - 029	Subject: Protective action guide references Basis: NUREG-0654, Evaluation Criterion J.9 SRP ACCEPTANCE CRITERION: Requirement H	
!	A. Pennsylvania	
	The PA State plan, Annex E, Appendix 7, Section 6, References; and Appendix 7, Attachment C, Tab 1, Ingestion Protective Action Decision Points incorrectly refer to and/or incorporate language from superseded 1982 FDA guidance. The current guidance document is Accidental Radioactive Contamination of Human Food and Animal Feeds; Recommendations for State and Local Agencies by FDA on August 13, 1998 (FDA 1998). Plan material should be amended as appropriate. Please provide corrected plan pages as specified.	PA
	B. Risk Counties	
	Risk County plans, Appendix 15, Section 3.B, Protective Actions; Appendix 15, Section 3.C. Notification; and Appendix 15, Attachment C, Ingestion Exposure Pathway Emergency Planning Zone, Section 2.A-D incorrectly refer to and/or incorporate language from superseded 1982 FDA guidance. The current guidance document is Accidental Radioactive Contamination of Human Food and Animal Feeds; Recommendations for State and Local Agencies by FDA on August 13, 1998 (FDA 1998). Plan material should be amended as appropriate. Please provide corrected plan pages as specified.	Luzerne Columbia
	(RAI continued next page)	

RAI Number	RAI Description	RAI For
(BBNPP – 029 cont'd)	Support County plans, Appendix 9 (Appendix 3 in Montour County), Section 3.B, Protective Actions; Section 3.C. Notification; and Attachment C, Ingestion Exposure Pathway Emergency Planning Zone, Section 2.A-D incorrectly refer to and/or incorporate language from superseded 1982 FDA guidance. The current guidance document is Accidental Radioactive Contamination of Human Food and Animal Feeds; Recommendations for State and Local Agencies by FDA on August 13, 1998 (FDA 1998). Plan material should be amended as appropriate. Please provide corrected plan pages as specified.	Lackawanna Lycoming Montour Northumberland Schuylkill Union Wyoming

RAI	2 .	RAI
Number	RAI Description	For
BBNPP - 030	Subject: Protective action guide references Basis: NUREG-0654, Evaluation Criterion J.9 SRP ACCEPTANCE CRITERION: Requirement H	
	A. Pennsylvania	
	A.1 PA State plan, Annex E, Appendix 7, Section 6, References; Appendix 7, Attachment C, Section C.1.f, Food Protection, General; and Appendix 7, Attachment C, Section C.2.F(1), Drinking Water PAG Analogues incorrectly refer to and/or incorporate language from superseded EPA drinking water guidance. The current drinking water guidance is 40 CFR 141.55, National Primary Drinking Water Regulations, Radionuclide Rule (EPA, December 7, 2000). Plan material should be amended as appropriate. Please provide corrected plan pages as specified.	PA
	A.2 BRP-ER-A-8.0, Ingestion Pathway, Section 8.2.1,  Drinking Water PAG Analogues incorrectly refers to and/or incorporate language from superseded EPA drinking water guidance. The current drinking water guidance is 40 CFR 141.55, National Primary  Drinking Water Regulations, Radionuclide Rule (EPA, December 7, 2000). Plan material should be amended as appropriate. Please provide corrected plan pages as specified.	BRP
	B. Risk Counties	
	Risk County plans, Appendix 15, Section 5, References, and Appendix 15, Attachment C, Ingestion Exposure Pathway Emergency Planning Zone, Section 2.B incorrectly refer to and/or incorporate language from superseded EPA drinking water guidance. The current drinking water guidance is 40 CFR 141.55, National Primary Drinking Water Regulations, Radionuclide Rule (EPA, December 7, 2000). Plan material should be amended as appropriate. Please provide corrected plan pages as specified.	Luzerne Columbia
	(RAI continued next page)	

RAI Number	RAI Description	RAI For
(BBNPP – 030 cont'd)	C. Support Counties  Support County plans, Appendix 9 (Appendix 3 in Montour County), Section 5, References, and Appendix 9 (Appendix 3 in Montour County), Attachment C, Ingestion Exposure Pathway Emergency Planning Zone, Section 2.B incorrectly refer to and/or incorporate language from superseded EPA drinking water guidance. The current drinking water guidance is 40 CFR 141.55, National Primary Drinking Water Regulations, Radionuclide Rule (EPA, December 7, 2000). Plan material should be amended as appropriate. Please provide corrected plan pages as specified.	Lackawanna Lycoming Montour Northumberland Schuylkill Union Wyoming
BBNPP - 031	Subject: Age-dependent KI dosage Basis: NUREG-0654, Evaluation Criterion J.10.e SRP ACCEPTANCE CRITERION: Requirement H  A. Pennsylvania  State Plan, Annex E, Appendix 5, Radiological Exposure Control, Section 4.a does not provide the age-dependent dosage level of KI for members of the general public (adolescents, children and infants). Please provide the age- dependent dosage level of KI for members of the general public (adolescents, children and infants).	PA

RAI Number	RAI Description	RAI For
BBNPP - 032	Subject: Traffic capacities of evacuation routes Basis: NUREG-0654, Evaluation Criterion J.10.i SRP ACCEPTANCE CRITERION: Requirement H	
	A. Pennsylvania  The PA State Plan, Annex E, Appendix 4, Protective Response, 6. Evacuation Time Estimates, Section E does not contain information on traffic capacities of evacuation routes. Please provide amended plan pages incorporating information on traffic capacities of evacuation routes.	PA
	B. Risk Counties  The Risk County Plans Appendix 10, Attachment B  Evacuation Time Estimates do not contain information on traffic capacities of evacuation routes. Please provide amended plan pages incorporating information on traffic capacities of evacuation routes.	Luzerne Columbia

RAI Number	RAI Description	RAI For
BBNPP - 033	Subject: Monitoring of school children Basis: NUREG-0654, Evaluation Criterion J.12 SRP ACCEPTANCE CRITERION: Requirement H	,
	A. Risk Counties  Risk County plans, Appendix 13 Radiological Exposure Control do not contain information on how school children (and staff evacuated with them) will be monitored for contamination if they are not evacuated prior to a release of radioactive materials. Please provide information on how school children (and staff evacuated with them) will be monitored for contamination if they are not evacuated prior to a release of radioactive materials.	Luzerne Columbia
	Montour County plan, Appendix 2 Host School Operations does not contain information on how school children (and staff evacuated with them) will be monitored for contamination if they are not evacuated prior to a release of radioactive materials. Please provide information on how school children (and staff evacuated with them) will be monitored for contamination if they are not evacuated prior to a release of radioactive materials.	Montour

RAI Number	RAI Description	RAI For
BBNPP - 034	Subject: Legal basis of plans Basis: NUREG-0654, Evaluation Criterion A.2.b SRP ACCEPTANCE CRITERION: Requirement H	
	<ul> <li>A. Risk Municipalities</li> <li>A.1 The Butler Township/Conyngham Borough plan has been adopted (signed) by Butler Township but not Conyngham Borough. Please provide evidence that Conyngham Borough has adopted the RERP.</li> <li>A.2 The Huntington Township/New Columbus Borough plan has been adopted (signed) by New Columbus but not Huntington Township. Please provide evidence</li> </ul>	Butler Twp/ Conyngham Bor Huntington Twp/ New Columbus Bor
	A.3 The Nescopeck Township plan cover is marked as a "Draft" with a date of 12/2003. The plan includes a notation that it was updated 2008 in lower right corner. Please provide an amended plan cover without the "Draft" notation.	Nescopeck Township
BBNPP - 035	Subject: Letters of Agreement Basis: NUREG-0654, Evaluation Criterion A.3 SRP ACCEPTANCE CRITERION: Requirement H  A. Pennsylvania  The PA State Plan, Annex E, Appendix 21 identifies agreements with support organizations, but no actual agreements or descriptions with signatory pages per are included as required by NUREG Criterion A.3. Please provide copies of the listed agreements or descriptions of each agreement with a signature page.	PA

RAI Number	RAI Description	RAI For
BBNPP - 036	Subject: Block diagrams of the response organization Basis: NUREG-0654, Evaluation Criterion A.1.c SRP ACCEPTANCE CRITERION: Requirement H  A. Support Counties  The Support County plans do not contain block diagrams; the NUREG cross reference indicates that this diagram is "TBD."	Lackawanna Lycoming Montour Northumberland Schuylkill Union Wyoming

RAI		RAI
Number	RAI Description	For
BBNPP - 037	Subject: Table of emergency responsibilities Basis: NUREG-0654, Evaluation Criterion A.2.a SRP ACCEPTANCE CRITERION: Requirement H  A. Risk Municipalities	Black Creek Twp Butler Twp/
	The Risk Municipality plans, Section V.A-I Emergency Responsibilities and Functions, and Section VI Emergency Management Organization do not provide a table or comparable clear and concise summary showing how the emergency responsibilities are discharged. Please provide a table or comparable clear and concise summary showing how the emergency responsibilities are discharged.	Conyngham Bor Conyngham Twp Dorrance Twp Hollenback Twp Hunlock Twp Huntington Twp/ New Columbus Bor Nanticoke City Nescopeck Bor Nescopeck Twp Newport Twp Nuangola Bor Salem Twp Shickshinny Bor Slocum Twp Sugarloaf Twp Union Twp
		Beaver Twp Berwick/Briar Crk Bor Briar Creek Twp Fishing Creek Twp Mifflin Twp North Centre Twp South Centre Twp
	B. Support Counties	The state of the s
	The Support County plans, Section 4.B <i>Organizations and Responsibility</i> do not provide a table or comparable clear and concise summary showing how the emergency responsibilities are discharged. The Support County plans also do not list all of the functions and responsibilities of the response organizations. Please provide a table or comparable clear and concise summary showing how the emergency responsibilities are discharged.	Lackawanna Lycoming Montour Northumberland Schuylkill Union Wyoming

RAI Number	RAI Description	RAI For
BBNPP - 038	Subject: Capability for protracted operations Basis: NUREG-0654, Evaluation Criterion A.4 SRP ACCEPTANCE CRITERION: Requirement H	
	A. Support Counties  The Support County plans, Enclosure 2, Staffing Status Flowchart lack any specific requirements for protracted operations (although it is noted on Enclosure 2, Staffing Status Flowchart) and do not assign a lead individual for continuity of operations. Please provide information describing requirements for protracted operations and assigning a lead individual for continuity of operations.	Lackawanna Lycoming Montour Northumberland Schuylkill Union Wyoming

RAI Number	RAI Description	RAI For
BBNPP - 039	Subject: Protective equipment for emergency workers Basis: NUREG-0654, Evaluation Criterion H.11 SRP ACCEPTANCE CRITERION: Requirement H	
	A. Pennsylvania  The PA State plan, Annex E, Appendix 5, Section 6, Radiological Exposure Control for Emergency Workers, says that emergency workers should use their suitable personal clothing as protective gear. However, BRP-ER-A- 6.02 Emergency Equipment Operational Checks and Maintenance, identifies the protective equipment (including coveralls, shoe covers and gloves) carried in the BRP emergency response vehicles. Please provide amended plan pages showing consistent policy regarding protective equipment for emergency workers.	PA
	B. Risk Counties  The Risk County plans, Appendix 13, Attachment A, Section D.6 say that personnel monitors should wear disposable or plastic gloves while monitoring.  Additionally, it is suggested that shirts/blouses with long sleeves and long trousers/slacks be worn. No additional information is provided regarding the availability, storage or inventory of protective equipment (e.g. gloves, paper suits, booties, etc). Please provide information addressing protective equipment for use by emergency workers (especially monitoring/ decontamination personnel (e.g. gloves, paper suits, booties, etc)).  (RAI continued next page)	Luzerne Columbia

	The state of the s	
RAI		RAI
Number		For
Number (BBNPP – 039 cont'd)	RAI Description  C. Risk Municipalities  Risk Municipality plans, Attachment I-5 list the dosimetry, KI, and area kits provided to municipality emergency responders during emergencies. No information is provided regarding the availability, storage or inventory of protective equipment (e.g. gloves, paper suits, booties, etc). Please provide information addressing protective equipment for use by emergency workers (e.g. gloves, paper suits, booties, etc).	Black Creek Twp Butler Twp/ Conyngham Bor Conyngham Twp Dorrance Twp Hollenback Twp Hunlock Twp Huntington Twp/ New Columbus Bor Nanticoke City Nescopeck Bor Nescopeck Twp Newport Twp Nuangola Bor Salem Twp Shickshinny Bor Slocum Twp Sugarloaf Twp Union Twp  Beaver Twp Berwick/Briar Crk Bor Briar Creek Twp Mifflin Twp
	D. Support Counties  Support County plans, Appendix 4 Monitoring/ Decontamination Procedures say that personnel monitors should wear disposable or plastic gloves while monitoring. It is suggested that shirts/blouses with long sleeves and long trousers/slacks be worn. No additional information is provided regarding the availability, storage or inventory of protective equipment (e.g. gloves, paper suits, booties, etc). Please provide information addressing protective equipment for use by emergency workers (especially monitoring/ decontamination personnel (e.g. gloves, paper suits, booties, etc)).	North Centre Twp South Centre Twp  Lackawanna Lycoming Montour Northumberland Schuylkill Union Wyoming

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RAI		RAI
Number	RAI Description	For
BBNPP - 040	Subject: 24-hour communication links Basis: NUREG-0654, Evaluation Criterion F.1.a SRP ACCEPTANCE CRITERION: Requirement H  A. Support Counties	
	The Support County plans do not describe the communications links that would be used for notification and the arrangements for 24-hour receipt and communication of emergencies. Please provide information describing communications links that would be used for notification and the arrangements for 24-hour receipt and communication of emergencies.	Lackawanna Lycoming Montour Northumberland Schuylkill Union Wyoming
BBNPP - 041	Subject: Communication links for medical facilities Basis: NUREG-0654, Evaluation Criterion F.2 SRP ACCEPTANCE CRITERION: Requirement H	
	A. Support Counties	
	The Support County plans do not identify any coordinated communication link for fixed and mobile medical support facilities. Please provide information identifying any coordinated communication link for fixed and mobile medical support facilities.	Lackawanna Lycoming Montour Northumberland Schuylkill Union Wyoming
BBNPP - 042	Subject: Emergency communications testing Basis: NUREG-0654, Evaluation Criterion F.3 SRP ACCEPTANCE CRITERION: Requirement H	
	A. Support Counties	To the same of the
	The Support County plans do not address testing of the emergency communications system. Please provide information describing testing of the emergency communications system.	Lackawanna Lycoming Montour Northumberland Schuylkill Union Wyoming

RAI Number	RAI Description	RAI For
BBNPP  - 043	Subject: Contamination monitoring capacity Basis: NUREG-0654, Evaluation Criterion J.12 SRP ACCEPTANCE CRITERION: Requirement H	
	A.1 The Support County plans (except Montour), Appendix 4, Section D.3 Calculations of the Number of Personnel That Can be Monitored in 12 Hours, indicates that 300 individuals per hour can be monitored with a portal monitor. Information is not provided on how the monitors are set up to accomplish this throughput. As stated, 300 individuals per hour would allow only 12 seconds per individual and does not account for transit time between individuals or any other circumstances that would cause monitoring delays (providing instructions, re-monitoring to verify alarms, etc). Please provide plan material explaining how 300 individuals per hour will be monitored with a portal monitor.	Lackawanna Lycoming Northumberland Schuylkill Union Wyoming
	A.2 Northumberland and Schuylkill County Plans do not indicate that they have portal monitors nor do they specify which type of hand-held survey instruments are in use; therefore, it cannot be determined if there is sufficient equipment/personnel allocated to monitor the evacuees assigned to their facilities within 12 hours. Provide information to verify contamination monitoring capacity to meet the requirement.	Northumberland Schuylkill

RAI Number	RAI Description	RAI For
BBNPP - 044	Subject: Add Bell Bend to plans Basis: NUREG-0654, Evaluation Criterion (ALL) SRP ACCEPTANCE CRITERION: Requirement H  A. Pennsylvania  The PA State plan does not include references specific to Bell Bend Nuclear Power Station or information from the most recent Evacuation Time Estimate. Amend all relevant plan areas per letters of agreement submitted with the license application to include specific references to Bell Bend Nuclear Power Station and the most recent Evacuation Time Estimate.	PA
	B. Risk Counties	
	The Risk County plans do not include references specific to Bell Bend Nuclear Power Station or information from the most recent Evacuation Time Estimate. Amend all relevant plan areas per letters of agreement submitted with the license application to include specific references to Bell Bend Nuclear Power Station and the most recent Evacuation Time Estimate.	Luzerne Columbia
	(RAI continued next page)	

RAI	7		RAI
Number		RAI Description	For
(BBNPP	C.	Risk Municipalities	
- 044 cont'd)		The Risk Municipality plans do not include references specific to Bell Bend Nuclear Power Station or information from the most recent Evacuation Time Estimate. Amend all relevant plan areas per letters of agreement submitted with the license application to include specific references to Bell Bend Nuclear Power Station and the most recent Evacuation Time Estimate.	Black Creek Twp Butler Twp/ Conyngham Bor Conyngham Twp Dorrance Twp Hollenback Twp Hunlock Twp Huntington Twp/ New Columbus Bor Nanticoke City Nescopeck Bor Nescopeck Twp Newport Twp Nuangola Bor Salem Twp Shickshinny Bor Slocum Twp Sugarloaf Twp Union Twp ————— Beaver Twp Berwick/Briar Crk Bor Briar Creek Twp Mifflin Twp North Centre Twp South Centre Twp
	<b>D</b> .	Support Counties	
	The second secon	The Support County plans do not include references specific to Bell Bend Nuclear Power Station or information from the most recent Evacuation Time Estimate. Amend all relevant plan areas per letters of agreement submitted with the license application to include specific references to Bell Bend Nuclear Power Station and the most recent Evacuation Time Estimate.	Lackawanna Lycoming Montour Northumberland Schuylkill Union Wyoming