



# Progress Energy

Serial: NPD-MISC-2009-009  
August 19, 2009

Ms. Vanessa E. Quinn  
U.S. Department of Homeland Security  
Federal Emergency Management Agency  
500 C Street, SW  
Washington, DC 20472

**LEVY NUCLEAR PLANT, UNITS 1 AND 2  
DOCKET NOS. 52-029 AND 52-030  
RESPONSE TO FEMA REQUEST FOR ADDITIONAL INFORMATION LETTER RELATED TO  
OFFSITE EMERGENCY RESPONSE PLANS**

- References:
1. Letter from Vanessa Quinn (FEMA) to Bob Kitchen (PEF), dated May 27, 2009, "Federal Emergency Management Agency's (FEMA) Final Requests for Additional Information (RAIs) for the Levy Nuclear Plant, Units 1 and 2 (LNP 1 and 2) Combined License (COL) Application"
  2. Letter from Vanessa Quinn (FEMA) to Bob Kitchen (PEF), dated July 6, 2009, "Federal Emergency Management Agency's (FEMA) Final Request for Additional Information (RAI) for Levy (LNP) Units 1 & 2 Combined License (COL) Application"

Ms. Quinn:

Progress Energy Florida, Inc. (PEF) hereby submits our response to the Federal Emergency Management Agency's (FEMA) request for additional information (RAI) concerning the Levy Nuclear Plant (LNP) Units 1 and 2 combined license application (see referenced letters).

A response to the FEMA request is provided in Enclosure 1 which lists the specific section(s) in the State of Florida and/or host county Radiological Emergency Plans that address each RAI. Supplemental text for RAIs requiring additional explanation is provided as Enclosure 2. Enclosure 3 lists the attachments to this letter, including the latest draft of the State of Florida, Citrus County, Levy County and Marion County Radiological Emergency Response Plans for LNP Units 1 and 2. The State of Florida, Citrus County, Levy County and Marion County participated in the development of the attached draft Radiological Emergency Response Plans.

If you have any further questions, or need additional information, please contact Bob Kitchen at (919) 546-6992, or me at (919) 546-6107.

Progress Energy Florida, Inc.  
P.O. Box 14042  
St. Petersburg, FL 33733

DO94  
AV45

LRO

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 19, 2009.

Sincerely,

A handwritten signature in black ink, appearing to read "Garry D. Miller". The signature is fluid and cursive, with the first name being the most prominent.

Garry D. Miller  
General Manager  
Nuclear Plant Development

Enclosures/Attachments

cc: Mr. Conrad Burnside, FEMA Region IV

cc (without attached CD):

U.S. NRC Document Control Desk  
U.S. NRC Region II, Regional Administrator  
Mr. Brian Anderson, U.S. NRC Project Manager

FEMA RAI	PGN RAI	NUREG-0654 Section	Marion E-Plan Section	Citrus E-Plan Section	Levy E-Plan Section	Florida E-Plan Section App. VI	Notes
LNP-001	L-0157	A.1.a	II	NA	NA	NA	
LNP-002	L-0158	A.1.b	II.A.1-11	NA	NA	NA	
LNP-003	L-0159	A.1.c	XVIII-Figure 4	V-Figure 5.A	V-Figure 5.A	NA	
LNP-004	NA	NA	NA	NA	NA	NA	LNP-004 not used in FEMA RAI numbering scheme
LNP-005	L-0160	A.1.d	II.A, III.A	NA	NA	NA	
LNP-006	L-0161	A.1.e	II, II.A	III.1, III.2.2, III.2.4	III.1, III.2.2, III.2.4	NA	
LNP-007	L-0162	A.2.a	II, XVIII-Figure 3	III.1, V-Figures 4A and 4B	III.1, V-Figures 4A and 4B	NA	
LNP-008	L-0163	A.3	XVII.3.1.7	II.3.2.6	II.3.2.6	NA	Additional response provided with enclosure
LNP-009	L-0164	A.4	II.A.1	NA	NA	NA	
LNP-010	L-0165	C.1.b	NA	NA	NA	IX.H	
LNP-011	L-0166	C.1.c	IX.F	III.2.4, III.2.4.2, III.2.6	I.5.3, III.2.4, III.2.6	NA	
LNP-012	L-0167	C.2.a	IX.B	I.1.3, III.2.1.5.1, III.2.7.1.1	I.1.3, III.2.1.5.1, III.2.7.1.1	NA	
LNP-013	L-0168	C.4	XVII.3.1.7	II.3.2.6	II.3.2.6	NA	Additional response provided with enclosure
LNP-014	L-0169	D.3	IV	III.2.2.3	III.2.2.3	NA	
LNP-015	L-0170	D.4	IV, V	I.3.2, III.2.2.3	I.3.2, III.2.2.3	NA	
LNP-016	L-0171	E.1	V, VII	III.2.2.1, III.2.4	III.2.2.1, III.2.4	NA	
LNP-017	L-0430	E.2	I, IV	III.2.2, III.2.2.3, III.2.4	III.2.2, III.2.2.3, III.2.4	NA	
LNP-018	L-0431	E.5	VI	III.2.3.2, III.2.3.4	III.2.3.2, III.2.3.4	NA	
LNP-019	L-0432	E.6	VI	III.2.3.2.4-5, III.2.3.3	III.2.3.2.4-5, III.2.3.3	NA	
LNP-020	L-0433	E.7	XXI-App 1	VI-App 2 and 4B	VI-App 2 and 4B	NA	
LNP-021	L-0434	F.1.a	VII.A	III.2.4	III.2.4	NA	
LNP-022	L-0435	F.1.b	VII.A	III.2.4	III.2.4	NA	
LNP-023	L-0436	F.1.c	VII.A	III.2.4.E	III.2.4.E	NA	
LNP-024	L-0437	F.1.d	VII.A	III.2.4.C	III.2.4.C	NA	
LNP-025	L-0438	F.1.e	VII.A	III.2.4	III.2.4	NA	
LNP-026	L-0439	F.2	VII.A	III.2.4.D	III.2.4.D	NA	
LNP-027	L-0440	F.3	VII.A-B	III.2.4, III.2.4.5	III.2.4.5	NA	
LNP-028	L-0441	G.1	VIII.A	II.3.6.1, III.2.3.1	II.3.6.1, III.2.3.1	NA	
LNP-029	L-0442	G.2	VIII.A	II.3.6.1.2, II.3.6.2, III.2.3.1	II.3.6.1, II.3.6.2, III.2.3.1	NA	
LNP-030	L-0443	G.3.a	VIII.C, D	NA	NA	NA	
LNP-031	L-0444	G.4.a	VIII.C-D	NA	NA	NA	
LNP-032	L-0445	G.4.b	VIII.C, IX.C	III.2.3.2.1	III.2.3.2.1	NA	
LNP-033	L-0446	G.4.c	VIII.D	III.2.3.2.3	III.2.3.2.3	NA	
LNP-034	L-0447	G.5	VIII.B	II.3.6.3	II.3.6.3	NA	
LNP-035	L-0448	H.4	IV, IX.A	III.2.2.2	III.2.2.2	NA	
LNP-036	L-0449	H.10	IX.E, XVIII-Figure 6	II.3.2.3, V-Figure 31	II.3.2.3, V-Figure 31	NA	
LNP-037	L-0450	H.11	IX.E, XVIII-Figure 6	II.3.2.3, V-Figure 31	II.3.2.3, V-Figure 31	NA	
LNP-038	L-0451	J.2	NA	NA	NA	NA	Additional response provided with enclosure
LNP-039	L-0452	J.9	XII.A	III.2.7.2.2, III.2.9.1, V-Fig. 3A-C, VI-App 4B	III.2.7.2.2, III.2.9.1, V-Fig. 3A-C, VI-App 4B	NA	
LNP-040	L-0453	J.10.a	XVIII-Figures 7-10, 12	III.2.5, III.2.9.8, III.2.9.11, VI-App 4B	III.2.5, III.2.9.10, V-Figures 14A-14B	V.C, XII.D-K	
LNP-041	L-0454	J.10.b	XVIII-Figures 8, 11	III.2.7.1.3, III.2.9.5, V-Figure 17B	III.2.7.1.3, III.2.9.5, V-Figures 17B and 20B	NA	
LNP-042	L-0455	J.10.c	VI	III.2.3.2.4-5, III.2.3.3, III.2.9.7.5	III.2.3.2.4-5, III.2.3.3, III.2.9.7.5	NA	
LNP-043	L-0456	J.10.d	XII.G	II.3.6.1.1, III.2.3.1.1, III.2.3.2.2.6, III.2.9.9	II.3.6.1.1, III.2.3.1.1, III.2.3.2.2.6, III.2.9.9	XII.G	
LNP-044	L-0457	J.10.e	XII.B	NA	NA	NA	
LNP-045	L-0458	J.10.f	XII.B	NA	NA	NA	
LNP-046	L-0459	J.10.g	XII.E-G	III.2.9.5, III.2.9.7	III.2.9.5, III.2.9.7	NA	

FEMA RAI	PGN RAI	NUREG-0654 Section	Marion E-Plan Section	Citrus E-Plan Section	Levy E-Plan Section	Florida E-Plan Section App. VI	Notes
LNP-047	L-0460	J.10.h	XII.I-J	III.2.9.7.6, III.2.9.9.2, III.2.9.10-11	III.2.9.7.6, III.2.9.9.2, III.2.9.10-11	NA	
LNP-048	L-0461	J.10.i	XVIII-Figure 10	III.2.7.1.3, III.2.9.7.1-2	III.2.7.1.3, III.2.9.7.1-2	NA	
LNP-049	L-0462	J.10.j	XII.C, E	III.2.9.6, III.2.9.7.7	III.2.9.6, III.2.9.7.4, III.2.9.7.7	NA	
LNP-050	L-0463	J.10.k	XII.D-E	III.2.7.2.6, III.2.9.4, III.2.9.7.4	III.2.7.2.6, III.2.9.4, III.2.9.7.4	NA	
LNP-051	L-0464	J.10.l	XII.F	III.2.7.1.3, VI-App 4B and 7B	III.2.7.1.3, VI-App 4B and 7B	NA	
LNP-052	L-0465	J.12	XII.H.2, XII.I.1	III.2.8.2-4, III.2.9.7.6, III.2.9.10-11	III.2.8.2-4, III.2.9.7.6, III.2.9.10-11	NA	
LNP-053	L-0466	K.3.a	XI	III.2.8	III.2.8	NA	
LNP-054	L-0467	K.3.b	XI	III.2.8.1	III.2.8.1	NA	
LNP-055	L-0468	K.4	XI	NA	NA	NA	
LNP-056	L-0469	K.5.a	XII.H	III.2.9.10	III.2.9.10	NA	
LNP-057	L-0470	K.5.b	XII.H.1-3	III.2.9.10.3	III.2.9.10.3	NA	
LNP-058	L-0471	L.1	XIII	NA	III.1.8, III.2.9.13	NA	
LNP-059	L-0472	L.4	XIII	III.1.9, III.2.9.13	III.1.9, III.2.9.13	NA	
LNP-060	L-0473	M.1	XIV	IV	IV	NA	
LNP-061	L-0474	N.1.a	XV	II.3.3	II.3.3	NA	
LNP-062	L-0475	N.1.b	XV	II.3.3.1	II.3.3.1	NA	
LNP-063	L-0476	N.2.a	XV	II.3.3.2.1	II.3.3.2.1	NA	
LNP-064	L-0477	N.2.c	XV	II.3.3.2.2	II.3.3.2.2	NA	
LNP-065	L-0478	N.3.a	XV	II.3.3.3	II.3.3.3	NA	
LNP-066	L-0479	N.3.b	XV	II.3.3.3	II.3.3.3	NA	
LNP-067	L-0480	N.3.c	XV	II.3.3.3	II.3.3.3	NA	
LNP-068	L-0481	N.3.d	XV	II.3.3.3	II.3.3.3	NA	
LNP-069	L-0482	N.3.e	XV	II.3.3.3	II.3.3.3	NA	
LNP-070	L-0483	N.3.f	XV	II.3.3.3	II.3.3.3	NA	
LNP-071	L-0484	N.4	XV	II.3.3.4	II.3.3.4	NA	
LNP-072	L-0485	N.5	XV	II.3.3.4	II.3.3.4	NA	
LNP-073	L-0486	O.1	XVI	II.3.5	II.3.5	NA	
LNP-074	L-0487	O.1.b	XVI	II.3.5	II.3.5	NA	
LNP-075	L-0488	O.4.a	XVI	II.3.5, V-Figure 27	II.3.5, V-Figure 27	NA	
LNP-076	L-0489	O.4.d	XVI	II.3.5, V-Figure 27	II.3.5, V-Figure 27	NA	
LNP-077	L-0490	O.4.f	XVI	II.3.5, V-Figure 27	II.3.5, V-Figure 27	NA	
LNP-078	L-0491	O.4.g	XVI	II.3.5, V-Figure 27	II.3.5, V-Figure 27	NA	
LNP-079	L-0492	O.4.h	XVI	II.3.5, V-Figure 27	II.3.5, V-Figure 27	NA	
LNP-080	L-0493	O.4.j	XVI	II.3.5, V-Figure 27	II.3.5, V-Figure 27	NA	
LNP-081	L-0494	O.5	XVI	II.3.5	II.3.5	NA	
LNP-082	L-0495	P.1	XVI	II.3.5.2	II.3.5.2	NA	
LNP-083	L-0496	P.2	II.A.1	NA	NA	NA	
LNP-084	L-0497	P.4	XVII.3.1.3, XVII.3.1.7	NA	NA	NA	
LNP-085	L-0498	P.5	XVII.3.1	II.3.1	II.3.1	NA	
LNP-086	L-0499	P.6	XIX	II.2.1, III.1	VI-App 8	NA	
LNP-087	L-0500	P.7	XIX	III.2.1.2, III.2.1.3	III.2.1.2, III.2.1.3	NA	
LNP-088	L-0501	P.8	XX	VII	VII	NA	
LNP-089	L-0502	P.10	XVII.3.1.6	II.3.1.6	II.3.1.6	NA	

**FEMA Letter No.:** LNP-RAI-FEMA

**FEMA Letter Date:** May 27, 2009

**FEMA Review of Off-site Emergency Planning**

**FEMA RAI NUMBER:** LNP-008

**Text of FEMA RAI:**

**Subject: Assignment of Responsibility**

**NUREG-0654 A.3**

**SRP ACCEPTANCE CRITERION: Requirement H**

*A. Citrus and Levy Counties*

Citrus and Levy Counties have not developed radiological emergency response plans for LNP that specifies letters of agreement to support operations. The Counties have developed radiological emergency response plans for CRNP that specifies letters of agreement to support operations. These plans provide a framework to use in the completion of radiological emergency response plans for LNP.

*B. Marion County*

Marion County has not developed specific radiological emergency response plans for LNP therefore no letters of agreement to support a response to an incident at LNP have been developed.

Develop and execute for Citrus, Levy and Marion Counties letters of agreement or memorandums of understanding with intergovernmental or private sector providers that address agreed upon roles of response functions with respect to assistance to be provided during an incident at LNP.

**PGN RAI ID #:** L-0163

**PGN Response to FEMA RAI:**

A. Section II.3.2.6 of both the Citrus and Levy County Radiological Emergency Plans require the counties to have and maintain Letters of Agreement up-to-date with appropriate facilities, resources and support organizations for the Levy Nuclear Plant. Progress Energy also operates the Crystal River Nuclear Plant located approximately 9 miles from the Levy Nuclear Plant. The supporting organizations needed for the Crystal River Nuclear Plant emergency plan are the same as needed for the Levy Nuclear Plant. The letters needed in support of the Plants are also provided as a figure in Section V of each county plan.

Citrus and Levy County signed a Letter of Certification to provide support in all aspects of emergency planning associated with the Levy Nuclear Plant. The letters, previously submitted with Revision 0 of the Levy COLA, are provided as an attachment. By virtue of organizational responsibilities, the county letters encompass local fire and law enforcement support. However, a letter from the Citrus County Department of Public Safety is provided specifically addressing the Citrus County Fire Department's concurrence to respond in the event of an emergency at the LNP or CRNP. No additional letters of agreement are required in support of the Levy Nuclear Plant for Citrus and Levy Counties at this time. The Levy Nuclear Plant radiological emergency response plan matches the CRNP framework referenced in section A of RAI LNP-008.

B. The Marion County Radiological Emergency Response Plan for the LNP addresses Letters of Agreement in Section XVII.3.1.7. The Plan requires the county to maintain up-to-date Letters of Agreement with appropriate facilities, resources and support organizations. Annual letters of Agreement for Citrus Memorial Hospital, Seven Rivers Regional Medical Center, and Nature Coast EMS are updated annually per the Citrus County Crystal River and Levy Nuclear Plant Radiological Emergency Plan. Separate Letters of Agreement are not needed in the Marion County Radiological Emergency Plan since the functions are the same. No additional medical or emergency response agency letters of agreement are needed for this Plan.

Marion County signed a Letter of Certification to provide support in all aspects of emergency planning associated with the Levy Nuclear Plant. The letter, previously submitted with Revision 0 of the Levy COLA, is provided as an attachment. By virtue of organizational responsibilities, the county letter encompasses local fire and law enforcement support. No additional letters of agreement, including non-governmental agencies, are required in support of the Levy Nuclear Plant for Marion County at this time. The Marion County Levy Nuclear Plant radiological emergency response plan matches the GRNP framework referenced in section A of RAI LNP-008.

**Attachments/Enclosures (provided on attached CD):**

Citrus County Letter  
Citrus Memorial Hospital Letter  
Department of Public Safety (Citrus) Letter  
Florida Division of Emergency Management Letter  
Levy County Letter  
Marion County Letter  
Nature Coast EMS Letter  
Seven Rivers Regional Medical Center Letter

**FEMA Letter No.:** LNP-RAI-FEMA

**FEMA Letter Date:** May 27, 2009

**FEMA Review of Off-site Emergency Planning**

**FEMA RAI NUMBER:** LNP-013

**Text of FEMA RAI:**

**Subject:** Emergency Response Support and Resources

**NUREG-0654 C.4**

**SRP ACCEPTANCE CRITERION:** Requirement H

*A. Citrus, Levy, and Marion Counties*

Letters of Agreement and other documents needed to provide emergency response support for an incident at LNP need to be developed.

Provide a copy of Citrus, Levy and Marion Counties' Letters of Agreement with all nongovernmental organizations that can be relied upon in an emergency at LNP to provide assistance.

**PGN RAI ID #:** L-0168

**PGN Response to FEMA RAI:**

Requested Letters of Agreement are provided per FEMA RAI LNP-008 response above.

**Attachments/Enclosures:**

See Attachments/Enclosures per response to FEMA RAI LNP-008 above.

**FEMA Letter No.:** LNP-RAI-FEMA

**FEMA Letter Date:** May 27, 2009

**FEMA Review of Off-site Emergency Planning**

**FEMA RAI NUMBER:** LNP-038

**Text of FEMA RAI:**

**Subject: Protective Response**

**NUREG-0654 J.2**

**SRP ACCEPTANCE CRITERION: Requirement H**

*A. Levy County*

The Florida REMP, Appendix VI states the 10-mile emergency planning zone has been sectioned off by geographical boundaries. These boundaries are represented by the term zone. The list defines nine (9) sets of protective actions that would or could be implemented within the 10-mile emergency planning zone during a radiological incident at the Crystal River Nuclear Power Plant. Florida REMP, Appendix VI, Figure VI-20 contains a chart with the time to clear the areas of 95 percent of the population during clear or inclement weather conditions as well as high traffic density and specific radiological conditions.

The Levy County REP Plan lists responsibilities for agencies involved in evacuating personnel and has maps and checklists for specific sectors and PADs for the CRNP. Specific evacuation routes and plans to handle on-site evacuation for LNP have not been developed.

Levy County needs to provide an LNP specific plan for providing assistance to the licensee during an evacuation of the site, evacuation routes for personnel to use, and alternatives that will be implemented during inclement weather and/or high traffic densities.

**PGN RAI ID #:** L-0451

**PGN Response to FEMA RAI:**

The evacuation of onsite individuals from the Levy Nuclear Plant is the responsibility of the LNP licensee as delineated in Sections B.4 and J.2 of the Levy Nuclear Plant Units 1 and 2 Emergency Plan. LNP management, or Emergency Coordinator upon activation of the LNP Emergency Response Organization, will direct the evacuation of non-essential personnel when conditions warrant. LNP personnel instructed to evacuate the site become members of the public upon exit and follow the same evacuation routes and instructions as all other members of the public. Directions to the members of the public include evaluation of inclement weather and other obstructions that may impact recommended routes. There are no special evacuation routes or reception centers and shelters for non-essential personnel who evacuate the site as members of the public. Therefore, no specific plan will be developed to provide assistance to the licensee during an evacuation of the site.

**Attachments/Enclosures:**

None.

List of Attachments to NPD-MISC-2009-009  
(Provided on attached CD)

Attachments

Associated FEMA RAI #

State of Florida – RERP (Draft)	Multiple
Citrus County – RERP (Draft)	Multiple
Levy County – RERP (Draft)	Multiple
Marion County – RERP (Draft)	Multiple
Citrus County Letter	LNP-008 & LNP-013
Citrus Memorial Hospital Letter	LNP-008 & LNP-013
Department of Public Safety (Citrus) Letter	LNP-008 & LNP-013
Florida Division of Emergency Management Letter	LNP-008 & LNP-013
Levy County Letter	LNP-008 & LNP-013
Marion County Letter	LNP-008 & LNP-013
Nature Coast EMS Letter	LNP-008 & LNP-013
Seven Rivers Regional Medical Center Letter	LNP-008 & LNP-013