

## CCNPP3COLA PEmails

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**From:** Arora, Surinder  
**Sent:** Friday, September 18, 2009 10:30 AM  
**To:** Poche, Robert; Jennifer.McQueeney@unistarnuclear.com;  
michael.stevenson@unistarnuclear.com  
**Cc:** CCNPP3COL Resource; Weiss, Eric; Williams, Kevin; Colaccino, Joseph; Chowdhury,  
Prosanta; Biggins, James; Vrahoretis, Susan; Hair, Christopher  
**Subject:** FINAL RAI No. 155 NSIR 2952  
**Attachments:** FINAL RAI 155 NSIR 2952.doc

Rob,

Attached please find the subject request for additional information (RAI). A draft of this RAI was provided to you on September 2, 2009. No clarification phone call was requested on this RAI.

The schedule we have established for review of your application assumes technically correct and complete responses within 30 days of receipt of RAIs. For any RAIs that cannot be answered within 30 days, it is expected that a schedule date for submitting your technically correct and complete response will be provided to the staff within the 30 day period so that the staff can assess how this information will impact the review schedule.

Your response letter should also include a statement confirming that the response does or does not contain any sensitive or proprietary information.

Thanks

**SURINDER ARORA, PE**  
**PROJECT MANAGER,**  
**Office of New Reactors**  
**US Nuclear Regulatory Commission**

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**Hearing Identifier:** CalvertCliffs\_Unit3Cola\_Public\_EX  
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**From:** Arora, Surinder

**Created By:** Surinder.Arora@nrc.gov

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Request for Additional Information No. 155 (eRAI 2952)

9/18/2009

Calvert Cliffs Unit 3  
UniStar  
Docket No. 52-016  
SRP Section: 13.03 - Emergency Planning  
Application Section: 13.03

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

13.03-7

**SITE-49:** 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; Evaluation Criteria A.3; 10 CFR 50, Appendix E. Section III; Appendix E.IV.A.8

**SRP ACCEPTANCE CRITERIA:** Requirements A and B; Acceptance Criteria 1, 2 and 18

**A.** Section A.1, "Concept of Operations," (pages A-1/8) of the Calvert Cliffs Nuclear Power Plant (CCNPP3) Unit 3 Emergency Plan provides a description of the Federal, State, and local government agencies that are intended to be part of the overall response organization. Information on the activities and responsibilities provided by States other than Maryland, county and private agencies, including utilities that respond during a CCNPP3 emergency is needed in the CCNPP3 Emergency Plan. Also identify the State and local officials responsible for planning, ordering and controlling appropriate protective actions.

**B.** Section A, "Assignment of Responsibility," (pages A-1/11) provides a list of participating organizations and a discussion of their roles and responsibilities. Provide a resolution of inconsistencies between the narrative and figures as identified below:

1. Provide organizations (i.e. Federal Emergency Management Agency (FEMA), Environmental Protection Agency (EPA), Federal Radiological Preparedness Coordinating Committee (FRPCC), Radiation Emergency Assistance Center/Training Site (REAC/TS) that were not identified in the block diagrams.
2. Identify in the diagram where the U.S. Department of Energy (DOE) assistance is requested.

**C.** A list of certifications between CCNPP3 and other emergency response support organizations is provided in Appendix 3, "Letters of Agreements (LOA) (Certification Letters)." These letters only certify that actual emergency planning arrangements would be finalized in a letter of agreement at a later stage in the new facilities licensing process. Provide the LOAs or propose an ITAAC for when the letters of agreement with all participating agencies (including medical providers) will be in the CCNPP3 Emergency Plan.

**SITE-50:** Onsite emergency response organization assignments

**Basis:** 10 CFR 50.47(b)(2); 10 CFR 50, Appendix E.IV.A.2.b; Appendix E.IV.A.5; NUREG-0654/FEMA-REP-1, Evaluation Criterion B.1; Evaluation Criterion B.5; Evaluation Criterion B.6; Evaluation Criterion B.9

**SRP ACCEPTANCE CRITERIA:** Requirements A and B; Acceptance Criteria 1 and 2

**A.** Section B, “Emergency Response Organization [ERO],” of the CCNPP3 Emergency Plan (pages B-1/43) and Annex, Section 2, “Organizational Control of Emergencies,” (pages 2-1/2) describes the CCNPP3 emergency response organization. Provide resolution of inconsistencies between the narrative, figures and tables as identified below:

- Address clerical staff and control room shift staff shown Figure B-1b in the text in Section B.5.a.
- Include the information from B.5.a.4.a, “TSC [Technical Support Center] Communicator,” and B.5.a.4.e, “HPN [Health Physics Network] Communicator,” and B.5.a.16, “OSC [Operations Support Center] Team Members,” in Figure B-1b.
- Address field monitoring teams and clerical staff shown in Figure B-1c in Section B.5.b.
- Address the Administrative Support Manager, clerical staff and facility support staff shown in Figure B-1d in Section B.5.c.
- Include the information from Section B.5.c, “JIC [Joint Information Center] Administrative Manager;” C.7, “Public Information Liaison;” C.10, “Technical Advisor;” and C.11, Radiological Advisor,” in Figure B-1d.
- Address the Shift Communication in Item 3 of Table B-1b, “Minimum Staffing Requirements for the CCNPP Unit 3 ERO,” (page B-37). Item 3 identifies several communicators but no “Shift Communicator.”
- The reference for the Emergency Plant Manager responsibilities is indicated in Section B.5.a.1, (page B-6) as Section B.5.a.3 but the title of Section B.5.a.3 is “TSC Director.”
- Explain what is meant by reference (e) for Table B-1a. Table B-1b, “Minimum Staffing Requirements for the CCNPP Unit 3 ERO,” (page B-39) reference (e) states, “All Shift ERO positions are listed in Table B-1a, contained in unit specific annexes.”
- Table B-1b includes positions not clearly listed in Figures B-1b, c or d (Communicator - Control Room (CR), TSC, OSC), Rad Controls Coordinator, Offsite and Onsite Monitoring Team Personnel, RP Personnel, Radiological Advisor, Technical Advisor, and Public Information Liaison).
- Figure B-1b includes positions not clearly listed in Table B-1b (Rad Protection Pool, Chemistry Pool, Operations Pool, Control Room Shift Staff).
- Figure B-1b includes TSC, OSC, CR in some boxes but not all.
- Figure B-1c includes positions not clearly listed in Table B-1b (Field Monitoring Teams, Security Coordinator).
- Figure B-1d includes positions not clearly listed in Table B-1b (Administrative Support Manager).

In providing this resolution of the inconsistencies, provide an explanation for each inconsistency of how the functionality of Table B-1 of NUREG-0654 is maintained and how a situation wherein individuals have multiple responsibilities or collateral duties is avoided. Elaborate on automated systems or plant design features that make the proposed staffing consistent with the functional intent of Table B-1 of NUREG-0654.

**B.** Table B-1b, “Minimum Staffing Requirements for the CCNPP Unit 3 ERO,” (page B-37/39) provides the complete staffing requirements for the ERO including, the 60 minutes augmentation, other on-call personnel, and full augmentation. NUREG-0654, Table B-1 identifies 30 minute and 60 minute augmentation capabilities. Provide a justification for any inconsistencies between NUREG-0654 Table B-1 requirements and Table B-1b minimum staffing augmentation. The justification should elaborate on how the functionality of Table B-1 of NUREG-0654 is maintained and how a situation wherein individuals have multiple responsibilities or collateral duties is avoided.

**C.** Authorities, responsibilities and duties are discussed for each position of the plant emergency response organization (ERO) staff but there was no discussion related to the use of Digital Instrumentation and Control (I&C) and Information Technology. Provide an explanation of how the ERO staffing levels are adequate to respond to issues related to the use of Digital I&C and Information Technology in the plant including those in the initial stage of an accident that require expertise to deal with issues in the Instrumentation and Control Service Center (I&CSC).

**D.** Table B-1b, “Minimum Staffing Requirements for the CCNPP Unit 3 ERO,” (pages B-37/39) identifies the Company Spokesperson, Public Information Director and JIC Director as “Other On-Call” staff. Provide an explanation of what is meant by “Other On-Call.”

13.03-9

**SITE-51:** Requesting, using and accommodating emergency response support resources

**Basis:** 10 CFR 50.47(b)(3); 10 CFR 50, Appendix E.IV.A.6; Appendix E.IV.A.7; NUREG-0654/FEMA-REP-1, Evaluation Criterion C.1.a and b; Evaluation Criterion C.1.c; Evaluation Criterion C.3; Evaluation Criterion C.4;

**SRP ACCEPTANCE CRITERIA:** Requirement A and B; Acceptance Criteria 1 and 2

**A.** Section C.1, “Federal Response Support and Resources,” (page C-1) of the CCNPP3 Emergency Plan states that Federal agency assistance is available through the National Response Plan (NRP) with the NRC as the lead agency. Revise the Plan to reflect the change to the NRP now known as the National Response Framework (NRF).

**B.** Section B.5.a, “Plant Emergency Response Organization,” (pages B-5/18) states initial liaison with Federal, State and local authorities is performed by the Plant Emergency Response Organization. Revise the CCNPP3 Emergency Plan to address, by title(s) the licensee staff authorized to request Federal assistance.

**C.** Section C.3, “Radiological Laboratories,” (pages C-1/2) describes the onsite laboratory capabilities for chemical and radiological analysis as well as contracted/backup laboratory services. Information regarding the location and availability of offsite radiological laboratories is needed in the CCNPP3 Emergency Plan.

13.03-10

**SITE-52:** Emergency Action Levels

**Basis:** 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4); Section IV.B of Appendix E to 10 CFR 50; NUREG-0654, FEMA-REP-1, Rev. 1, November 1980:

**SRP ACCEPTANCE CRITERIA:** Requirements A and B; Acceptance Criterion 3.

In response to RAI 13.03-4 (RAI No. 81 Emergency Planning) the applicant responded on April 14, 2009 (ADAMS Accession Number ML091060754) by stating that "Unistar will withdraw the submitted COLA Part 5 related Emergency Action Level (EAL) Enclosures A, B and C and use Option 2." However, in response to critical element 2, the applicant further states "UniStar will develop the remainder of its EAL scheme by utilizing NEI 99-01 Revision 5, or the most current NRC endorsed version available at the time of EAL submittal. The submitted EALs will be written with no deviations pending resolution of two U.S. EPR design specific FAQs concerning; (1) digital I&C and (2) automatic containment depressurization setpoint issued to NEI on 03/1 0/09."

The NRC can accept a commitment to a specific endorsed standard such as NEI 99-05 Revision 5 as a basis for a combined license (COL) but not to the "most current NRC endorsed version available at the time of EAL submittal."

Amend your response and delete the words from the response that commits to an as yet unapproved and unknown version of EALs.

13.03-11

**SITE-54:** Communication processes

**Basis:** 10 CFR 50.47(b)(6); 10 CFR 50, Appendix E.IV.E.9; 10 CFR 50.72(a)(4); Generic Letter 91-14; NUREG-0654/FEMA-REP-1, Evaluation Criterion F.1.c; Evaluation Criterion F.1.e

**SRP ACCEPTANCE CRITERIA:** Requirements A, B and F; Acceptance Criteria 1, 2 and 29

**A.** Section F.1, "Communications/Notifications," (pages F-1/3) of the CCNPP3 Emergency Plan identifies the local commercial telephone system, Emergency Response Data System (ERDS), Emergency Notification System (ENS) and Health Physics Network (HPN) as communication systems established to ensure reliable and timely exchange of information between the site Control Room, Technical Support Center and Emergency Operations Facility and Federal emergency response organizations. Address in the CCNPP3 Emergency Plan provisions for communication with Federal emergency response organizations other than the NRC, such as the U.S. Coast Guard.

**B.** Section F.1, "Communications/Notifications," (pages F-1) states the automated Emergency Response Organization (ERO) notification system, consisting of a computer capable of initiating and receiving telephone calls and activating pagers, is used to rapidly notify ERO members. Implementing procedures include actions should the ERO notification system fail. Provide a procedure title in Appendix 2, "Procedure Cross-Reference to NUREG-0654," in the CCNPP3 Emergency Plan.

C. Section F.1, "Communications/Notifications," (pages F-1/3) discusses the ENS, HPN and the ERDS. There is no reference to the Reactor Safety Counterpart Link (RSCL), Protective Measures Counterpart Link (PMCL), Management Counterpart Link (MCL), Local Area Network (LAN), Generic Letter 91-14 or NRC Bulletin 80-15. Discuss how the licensee is implementing Generic Letter 91-14 and NRC Bulletin 80-15 requirements.

13.03-12

**SITE-55:** 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; Evaluation Criterion G.3.a; ; Evaluation Criterion G.4.b

**SRP ACCEPTANCE CRITERIA:** Requirements A and B; Acceptance Criteria 1 and 2

Section B.5.c states that the Public Information ERO operates out the Joint Information Center (JIC). Describe in the CCNPP3 Emergency Plan the physical location of the Joint Information Center (JIC) and any other locations for use by the news media during an emergency.

13.03-13

**Site 56:** 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; 10 CFR 52.79(a)(17); 10 CFR 50.34(f)(2)(iv); Supplement 1 to NUREG-0737, "Clarification of TMI Action Plan Requirements," NUREG-0654/FEMA-REP-1, Evaluation Criterion H.1; Evaluation Criterion H.2; Evaluation Criterion H.4; Evaluation Criterion H.6; Evaluation Criterion H.7; Evaluation Criterion H.9; Evaluation Criterion H.11

**SRP ACCEPTANCE CRITERIA:** Requirements A, B and F; Acceptance Criteria 1, 2, 4, 5, 12, 25, and 26

**A.** The CCNPP3 Emergency Plan does not state that the Technical Support Center (TSC) and Emergency Operations Facility (EOF) are built in accordance with the Uniform Building Code. Provide clarification that the TSC and EOF are built in accordance with the Uniform Building Code.

1. Annex, Section 4.1.B, "Technical Support Center," (page Annex p 4-1/2) states that the TSC has the same protection from radiological hazards as the Control Room.

Will the CCNPP3 TSC meet the requirements in the FSAR for the EPR design of the TSC? If not, verify that any person working in the TSC would not exceed 5 rem whole body, or its equivalent to any part of the body, for the duration of an accident.

**B.** The physical location of the EOF is not identified. Provide the name of the facility, location of the EOF and describe its physical location in relation to the CCNPP3 Site and revise the CCNPP3 Emergency Plan to include the information. Reference where in the CCNPP Units 1 and 2 Emergency Plan that the information below can be found or provide information for the following items:

1. Section H.2, "Emergency Operations Facility (EOF)," page H-4 states that the EOF technical data system receives, processes, and displays information sufficient to

- perform assessments of the actual and potential onsite and offsite environmental consequences of an emergency condition. Provide additional information related to the equipment for gathering and displaying data and the technical data system inputs and outputs available in the EOF.
2. A summary of the radiation protection features described in Table 1 (NUREG-0737 Supplement 1) were not addressed in the CCNPP3 Emergency Plan. Provide a summary of the radiation protection features for the EOF in the CCNPP3 Emergency Plan.
  3. Environmental controls to provide room air temperature, humidity, and cleanliness appropriate for personnel and equipment in the EOF were not addressed. Provide clarification that the EOF is environmentally controlled to provide room air temperature, humidity and cleanliness appropriate for personnel and equipment.
  4. There is no discussion of security for the EOF when it is activated or when it is idle. Provide a summary of the security measures to exclude unauthorized personnel when it is active and maintaining readiness when it is idle.

**C.** Section H.6.b, "Radiological Environmental Monitors and Sampling," (page H-9) states that the offsite environmental monitoring program is described in the Offsite Dose Calculation Manual (ODCM). The ODCM states that it will be redeveloped following endorsement of NEI 07-09 by NRC. Explain how dosimetry for offsite monitoring and analysis meets the NRC Radiological Assessment Branch Technical Position for the Environmental Radiological Monitoring Program.

**D.** Section H.6.c, "Laboratory Facilities," (page H-9) states other Licensee sites or contracted laboratories can provide backup capabilities within a few hours of notification. Provide the names, locations and a discussion of the services each "other Licensee and contracted laboratory" will provide and include this information in the CCNPP3 Emergency Plan. Provide appropriate Letters of Agreements or Memoranda of Understanding.

**E.** Section H.9, "Operations Support Center Capabilities," (OSC) (page H-10) states that the OSC has sufficient respiratory protection gear, KI, protective clothing, and other health physics equipment and supplies. Section H.1.c, "Operations Support Center," (page H-3) states that a limited inventory of supplies, including respirators, protective clothing, flashlights and portable survey instruments are kept for the OSC. Clarify the inconsistencies between types and quantities (sufficient vs. limited) of supplies maintained for the OSC.

**F.** Section F.1.b-d.5, "Emergency Response Data System (ERDS)," (page F-2) addresses the ERDS system.

1. Discuss the compatibility of the ERDS link control and data transmission with the NRC receiving system.
2. Discuss the software and hardware maintenance of the Emergency Response Data System (ERDS).

**G.** Annex, Section 4.2.B, "Onsite Radiation Monitoring Equipment," (pages 4-3/5) discusses monitoring equipment and obtaining samples. No discussion was found regarding radiation exposures to individuals obtaining samples. Describe the capability



to promptly obtain and analyze samples from the reactor coolant system and containment that may contain accident source term radioactive materials without radiation exposures to the individual exceeding 5 rems to the whole body or 50 rem to the extremities.

13.03-14

**SITE-57:** 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.5; Evaluation Criterion I.7; Evaluation Criterion I.8; Evaluation Criterion I.10; Supplement 1 to NUREG-0737, Section 6.1.b.3. - Control Room Post-accident sampling capability; Regulatory Guide 1.97 (Rev. 2),  
**SRP ACCEPTANCE CRITERIA:** Requirement A; Acceptance Criteria 1, 4, 5, 25, 27 and 28

**A.** Section I.1, "Plant Parameters and Corresponding Emergency Classification," (page I.1) of the CCNPP3 Emergency Plan states that plant system parameters that characterize an Emergency Action Level (EAL) are presented in EAL Technical Bases. Provide a specific reference to the EAL Technical Bases document in the CCNPP3 Emergency Plan.

**B.** Section I.2, "Onsite Accident Assessment Capabilities," (page I-1) states that resources are available to provide initial and continuing information for accident assessment throughout the accident until it is declared over. Confirm that the CCNPP3 Control Room will meet the requirements in the FSAR for the EPR design of the Control Room or summarize the Control Room radiological monitoring instrumentation and determine if the monitoring equipment meets the requirements of NUREG-0737 Supplement I. Include the result of the review in Section H.5 or I.2

**C.** Appendix 4, "Glossary of Terms and Acronyms," lists the PASS, Post Accident Sampling System. Provide additional information on PASS and include a summary in the CCNPP3 Emergency Plan.

**D.** Section A.1.a.1.i, "Federal Agencies," (page A-5) states that the National Weather Service (NWS) provides meteorological data including existing and forecasted wind speed, direction and ambient air temperature during emergency situations if required. Include verification of NWS's 24/7 availability in the CCNPP3 Emergency Plan.

**E.** Section H.5.a, "Geophysical Monitors," [onsite] (page H-6) and Section H.6.a, "Geophysical Monitors," [offsite] (page H-9) states the NWS, regional weather forecasters, contracted weather providers or the internet may be contacted to provide weather information.

1. Provide additional information on the method for adapting the NWS, regional weather forecasters, contracted weather providers or the internet data for onsite use.
2. Provide details regarding the contracted weather provider mentioned in Section H.6.a.

**F.** Section H.5.a.1, "Meteorological Instrumentation," (page H-6) states that the information is transferred onsite by means of the plant computer system. Provide information on how the Licensee provides meteorological data to the State(s) and include a statement in the CCNPP3 Emergency Plan.

**G.** A minimum of two offsite monitoring teams are dispatched by company or personal vehicles at an Alert or higher class. Include the estimated deployment time for Monitoring Teams in the CCNPP3 Emergency Plan.

**H.** Section I.10, "Dose Estimates," (page I-5) states that procedures exist for the correlation of air activity levels to dose rate for "key isotopes." Include key isotopes and a summary of the provisions for estimating integrated dose from the projected and actual dose rates and for comparing these estimates with the protective action guides in the CCNPP3 Emergency Plan.

13.03-15

**SITE-58:** 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.6; Evaluation Criterion J.7; Evaluation Criterion J.8; Evaluation Criterion J.10.a

**SRP ACCEPTANCE CRITERIA:** Requirements A and B; Acceptance Criteria 1 and 2

**A.** Section J.1, "Notification of Onsite Personnel," (page J-1) of the CCNPP3 Emergency Plan states that provisions exist for notification of personnel in high noise areas and outbuildings and people outside of the Protected Area but within the Owner Controlled Area. Include an explanation of the provisions for notification of personnel in high noise areas and outbuildings and people outside of the Protected Area but within the Owner Controlled Area.

**B.** Annex, Section 5.1, "Unit Assembly Areas," (page 5-1) discusses site assembly areas but offsite relocation areas are not identified. Identify the location of offsite relocation areas in CCNPP3 Emergency Plan and, if offsite locations are not under the applicant's control, provide letters of agreement. State whether these are the same locations as used for CCNPP Units 1 and 2.

**C.** Section J.2, "Evacuation Locations," (page J-1) states that transportation is normally done by personal means using established evacuation routes. It is indicated that those without transportation will be provided transportation as necessary. Describe the process used to provide transportation for the evacuation of personnel without vehicles.

**D.** Section J.6.c, "Use of Potassium Iodide (KI)," (page J-3) states that, "The station(s) are responsible for maintaining a supply of KI at their respective site." Identify the location of the KI supply to be used by onsite personnel and the individual responsible for maintenance and distribution of KI.

**E.** Section J, "Protective Response," (pages J-1/7) discusses how to evaluate the need for and initiate a protective action recommendation (PAR). Provide additional information related to relaxing and extending PARs.

**F.** Appendix 5 only references the Evacuation Time Report (August 30, 2002 version) and states that, "The results are provided separately in Part 11 of the COL Application." Clarify the location of the referenced ETE report and revise the CCNPP3 Emergency Plan accordingly.

**G.** Section J.10.a, "Implementation of Protective Action Recommendations," (pages J-4/6) states that public evacuees leave the site on designated evacuation routes. Figure 1-2, "10-Mile (16 Kilometer) Emergency Planning Zone [EPZ]," (Part I, page 7) provides a map of regional evacuation areas in the 10-mile EPZ. However, maps, or a reference to the document that contains the maps, showing evacuation routes, pre-selected radiological sampling and monitoring points, relocation centers, and shelters are needed in the CCNPP3 Emergency Plan.

13.03-16

**SITE-59:** Contamination control and dose limits

**Basis:** 10 CFR 50.47(b)(11); NUREG-0654/FEMA-REP-1, Evaluation Criterion K.3.a; Evaluation Criterion K.3.b; Evaluation Criterion K.5.a; Evaluation Criterion K.5.b; Evaluation Criterion K.6; Evaluation Criterion K.7

**SRP ACCEPTANCE CRITERIA:** Requirement A; Acceptance Criterion 1

**A.** Section K.3.a, "Personnel Monitoring," (pages K-2) of the CCNPP3 Emergency Plan states emergency workers will receive Thermoluminescent Dosimeter (TLD) badges and personal self-reading dosimeters on a real time basis. Emergency processing of TLDs on a 24-hour per day basis exists. Include the 24-hour TLD processing organization name in the CCNPP3 Emergency Plan.

**B.** Section K.3.b, "Personnel Monitoring," (pages K-2) states emergency worker dose records are maintained in accordance with the emergency and radiological protection procedures.

1. Provide additional information regarding arrangements for alternative access to dose records when accident conditions do not allow normal access.
2. Explain how emergency doses are recorded and state whether dose limits are included as occupational exposure per 10 CFR 20.1201(a) or if they are treated as a once-in-a-lifetime exposure and not included as stated in EPA 400-R-92-001.

**C.** Section K.5.a, "Contamination Limits," (pages K-3) states that normal plant contamination control criteria will be followed during emergency conditions to the extent possible. Include details regarding action levels for determining the need for decontamination and contamination control criteria for returning areas and items to normal use in the CCNPP3 Emergency Plan.

**D.** Annex, Section 4.1E, "Decontamination Facilities," (page 4-2) identifies the Access Building as the location for the personnel decontamination. Provide additional information on the decontamination of personnel wounds, types of decontamination supplies and a reference to decontamination procedures and include a summary of that information in the CCNPP3 Emergency Plan.

13.03-17

**SITE-60:** Medical services for CCNPP3 workers and contaminated injured individuals  
**Basis:** 10 CFR 50.47(b)(12); 10 CFR 50, Appendix E.IV.E.5; Appendix E.IV.E.6; Appendix E.IV.E.7; NUREG-0654/FEMA-REP-1, Evaluation Criterion L.1; Evaluation Criterion L.2; Evaluation Criterion L.4;  
**SRP ACCEPTANCE CRITERIA:** Requirements A and B; Acceptance Criteria 1 and 2

**A.** Section L.2, "Onsite First Aid Capability," (pages L-1/2) of the CCNPP3 Emergency Plan states that first aid supplies and equipment for treatment of contaminated injured are maintained however there is no discussion, list or reference to where the supplies and equipment information is located. Revise the CCNPP3 Emergency Plan to include a discussion, list or reference to where the first aid supplies and equipment information is located.

**B.** Section L.4, "Medical Transportation," (page L-2) of the CCNPP3 Emergency Plan states arrangements for 24-hour service for prompt ambulance transport of persons with injuries involving radioactivity to designated hospitals are confirmed by letter of agreement.

1. Letters identified in Appendix 3, "Letters of Agreements (Certification Letters)," (page-A3-1) did not include statements that radiologically contaminated injured patients would be transported. Clarify that arrangements with support organizations include the transport of radiologically contaminated injured patients to medical support facilities.
2. Provide the name of the facility dedicated to receive CCNPP radiologically contaminated injured persons and include in the CCNPP3 Emergency Plan.

13.03-18

**SITE-61:** Recovery and reentry actions  
**Basis:** 10 CFR 50.47(b)(13); 10 CFR 50, Appendix E.IV.H; NUREG-0654/FEMA-REP-1, Evaluation Criterion M.1; Evaluation Criterion M.3; Evaluation Criterion M.4  
**SRP ACCEPTANCE CRITERIA:** Requirements A and B; Acceptance Criteria 1 and 2

Section M.3, "Recovery Phase Notifications," (page M-7) of the CCNPP3 Emergency Plan states that all members of the ERO are informed of the decision to enter the recovery phase and instructed of the Recovery Organization and their responsibilities to the recovery effort. Describe the means for informing members of the response organizations that a recovery operation is to be initiated.

13.03-19

**SITE-62:** Drill and exercise evaluation and critiques  
**Basis:** 10 CFR 50.47(b)(14); 10 CFR 50, Appendix E.IV.F.2; Appendix E.IV.F.2.b; Appendix E.IV.F.2.f; NUREG-0654/FEMA-REP-1, Evaluation Criterion N.2; Evaluation Criterion N.3  
**SRP ACCEPTANCE CRITERIA:** Requirements A and B; Acceptance Criteria 1 and 2

**A.** Health Physics drills are conducted semi-annually and involve response to and analysis of, simulated airborne and liquid samples and direct radiation measurements within the plant. A demonstration of the sampling system capabilities, or the core damage assessment objectives as applicable are conducted at least annually. Clarify

whether drills will include liquid samples with actual elevated radiation levels and address the use of the post-accident sampling system in health physics drills and provide an explanation of the provisions for including State and local response agencies in the drills.

**B.** Section N.5, "Resolution of Drill and Exercise Findings," (pages N-5/6) states that CCNPP3 will support remedial exercises if the Emergency Plan is not satisfactorily tested during the biennial exercise. Provide additional information regarding the extent of State and local participation for remedial exercises.

13.03-20

**SITE-63:** 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; NUREG-0654/FEMA-REP-1, Evaluation Criterion O.3; Evaluation Criteria O.4.a through O.4.j

**SRP ACCEPTANCE CRITERIA:** Requirements A and B; Acceptance Criteria 1 and 2

Section O.3, "First Aid Response," (pages O-2) of the CCNPP3 Emergency Plan states that selected personnel are trained in accordance with the Licensee approved first aid program. Provide additional information on the First Aid program training, including its equivalency to the Red Cross Multi-Media course.

13.03-21

**SITE-64:** Emergency preparedness program maintenance and implementing procedures

**Basis:** 10 CFR 50.47; NUREG-0654/FEMA-REP-1; Evaluation Criterion P.2;

**SRP ACCEPTANCE CRITERIA:** Requirement A; Acceptance Criterion 1

Section P.2, "Authority for the Emergency Preparedness Effort," (pages P-1) of the CCNPP3 Emergency Plan states that the Site Vice President shall have overall responsibility for issuance and control of the emergency plan and activities associated with emergency preparedness at CCNPP3. Section P.2 also states "these individuals are assigned the responsibility for overall implementation of the Licensee Emergency Plan and Unit Annex for CCNPP3," however there is only one individual mentioned, the Site Vice President. Clarify what is meant by "these individuals" in Section P.2 and revise the CCNPP3 Emergency Plan if necessary.