

PMComanchePekNPPEm Resource

From: Monarque, Stephen
Sent: Monday, September 28, 2009 12:05 PM
To: Robinson, Edward
Subject: FW: Comanche Peak RCOL Section 13.3 - RAI # 78 - emergency planning
Attachments: RAI 3327 (RAI 78).doc

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Sent: Thursday, September 24, 2009 5:32 PM
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Cc: Takacs, Michael; ComanchePeakCOL Resource
Subject: Comanche Peak RCOL Section 13.3 - RAI # 78 - emergency planning

The NRC staff has identified that additional information is needed to continue its review of the combined license application. The NRC staff's request for additional information (RAI) is contained in the attachment. Luminant is requested to inform the NRC staff if a conference call is needed.

The response to this RAI is due within 42 calendar days of September 24, 2009.

Note: If changes are needed to the safety analysis report, the NRC staff requests that the RAI response include the proposed changes.

thanks,

Stephen Monarque
U. S. Nuclear Regulatory Commission
NRO/DNRL/NMIP
301-415-1544

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Request for Additional Information (RAI) No. 3327

RAI # 78

9/24/2009

Comanche Peak Units 3 and 4
Luminant Generation Company, LLC.
Docket No. 52-034 and 52-035
SRP Section: 13.03 - Emergency Planning
Application Section: Part 5 Emergency Planning

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

13.03-2

SITE-1: Assignment of Responsibilities (Organizational Control)

Basis: 10 CFR 50.47(b)(1), Planning Standard A; 10 CFR 50, Appendix E.III., Appendix E.IV.A.8; NUREG-0654/FEMA-REP-1, Evaluation Criterion A.1, 2, 3, 4

Standard Review Plan (SRP) ACCEPTANCE CRITERIA (NUREG-0800, section 13.3):
Requirements A and B; Acceptance Criteria 1 and 2.

- A-1. The Texas Department of State Health Services is identified as a participating organization, but Figure II-1, "Emergency Response Organization Interrelationships," shows Texas Department of Health. The Radiation Control Program (RCP) of the Texas Department of State Health Services is identified as a participating organization, but is not shown in Figure II-1. Appendix 7, "Certification Letters and Letters of Agreement," includes letters of agreement for five organizations that are not shown in the block diagram.
- A. Clarify whether the block labeled Texas Department of Health in Figure II-1 is the same as Texas Department of State Health Services (TDSHS) in Section II.A.1.a. Revise Figure II-1 as appropriate.
 - B. Discuss whether the Radiation Control Program should be shown in Figure II-1. Revise Figure II-1 as appropriate.
 - C. Discuss whether the Environmental Protection Agency (EPA) shown in Section II.A.1.b is a participating organization, and whether it should be listed in Section II.A.1.a and in Figure II-1. Revise Figure II-1 as appropriate.
 - D. Discuss whether Walls Regional Hospital, Granbury/Hood County EMS, Granbury Volunteer Fire Department, Tolar Volunteer Fire Department, Indian Harbor Volunteer Fire Department, or DeCordova Bend Estates Volunteer Fire Department, which are listed in Sec.II.A.1.b, should be added to Figure II-1. Revise Figure II-1 as appropriate.

- E. Discuss whether the Cities of Stephenville, Cleburne, and Granbury, the National Weather Service, and the American Red Cross should be shown in Figure II-1. Revise Figure II-1 as appropriate.
- A-2. Appendix 8, "Cross Reference to Regulations, Guidance, and State and Local Plans," states that details of the State and county Plans may not yet reflect the addition of CPNPP Units 3 and 4. Clarify when State and county Plans will reflect the addition of Comanche Peak Nuclear Power Plant (CPNPP), Units 3 and 4. Include this information in the Emergency Plan.
- A-3. The letters of agreement in Appendix 7, "Certification Letters and Letters of Agreement," for the State, Somervell and Hood Counties state that specific arrangements will be established in binding agreements if and when construction and operation proceed.
 - A. Propose an ITAAC that describes emergency measures to be provided, implementation criteria, and information exchange arrangements to be incorporated into binding agreements for the State and counties if and when construction and operation proceeds. Include this information in the Emergency Plan.

13.03-3

SITE-2: On-site Emergency Response Organization (ERO)

Basis: 10 CFR 50, Appendix E.IV.A: 1, 2, 4, 5; NUREG-0654/FEMA-REP-1, Evaluation Criterion B1 through 9

SRP ACCEPTANCE CRITERIA (NUREG-0800, section 13.3): Requirements A and B; Acceptance Criteria 1 and 2.

- B-1. Section II.B.7, "Corporate (Off-site) Support for the Plant Staff," states that the applicant is fully committed to providing management and personnel resources to assist the ERO, and that this arrangement preempts the need for a separate organization of off-site corporate personnel to be identified for, and incorporated in, the ERO. However, the applicant does not describe how this arrangement negates the use of Off-site corporate support. Describe, by position and function, how the ERO will be effectively staffed (24hrs) without the use of Off-site corporate support.
- B-2. Additional information is needed regarding employees and other non-employees with special qualifications. Describe the special qualifications by position and function to be performed of other employees and non-employees that may be called upon for assistance for emergencies. Include this information in the Emergency Plan.

- B-3. Section II.B.6, "Interfaces Between Functional Areas," (page II-22) identifies interfaces among Emergency Response Facilities, corporate support, and State and County government response organizations and includes a block diagram, Figure II-1, "Emergency Response Organization Interrelationships." However, there are differences between the organizations described and those identified in Figure II-1.
- A. The Security Shift Supervisor described in Section II.B.1 is not shown in Figure II-2. Discuss why the security function is not included in Figure II-2, and revise Figure II-2 as appropriate.
 - B. The Emergency Repair & Damage Control Emergency Team described in Section II.B.1 is not shown in Figure II-2. Describe whether the function of emergency repair and damage control is represented by Maintenance Personnel in Figure II-2. Revise Figure II-2 as appropriate.
 - C. Describe the responsibilities of Communicators assigned to the Technical Support Center (TSC) and Emergency Operating Facility (EOF), and of the Team Communicator in the Operations Support Center (OSC). Include this information in the Emergency Plan (EP).
 - D. An EP Advisor is identified in Figure II-3, "Emergency Response Organization – Technical Support Center Manager as Emergency Coordinator," but this position is not defined. Describe the functional responsibilities of the EP Advisor, and include this information in the Emergency Plan.
 - E. Section II.B.5, "Plant Emergency Response Positions," includes a description of On-Site Survey Teams dispatched from the OSC; however, Figure II-4, "Emergency Response Organization – Operations Support Center," does not include an entry for On-Site Survey Teams. Clarify if the Radiation Protection Technicians shown in Figure II-4 are equivalent to the On-Site Survey Teams described in Section II.B.5.
 - F. Board Recorder, Clerical Support, Manpower Coordinator, Procurement Coordinator, and Contracts Coordinator positions are shown in Figures II-3, II-4, and II-5, but their responsibilities are not described. Describe the responsibilities for Board Recorders, Clerical Support, Manpower Coordinator, Procurement Coordinator, and Contracts Coordinator in Figure II-5, and positions shown in Figure II-6. Include this information in the Emergency Plan.
- B-4. Section B.5, "Plant Emergency Response Positions," of the Emergency Plan states that Luminant maintains emergency response staffing capability consistent with Table II-2, "Plant Staffing Requirements for Emergencies," which is based on the guidance provided in NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Nuclear Power Plants," and the provisions of the Emergency Plans of currently licensed Luminant nuclear facilities. Address the following questions regarding Table II-2:

- A. In Table II-2, "Plant Staffing Requirements for Emergencies," the Radwaste Operator, Mechanic, Electrician, and I & C Technician are identified as a minimum staffing position, which may be provided by on-shift or augmented by personnel assigned other functions. Clarify whether the job functions of the Radwaste Operator, Mechanic, Electrician, and I & C Technician are carried out by other on-shift staff and discuss whether this is a collateral duty. If this is a collateral duty, discuss its impact on the ability to fulfill ERO functions.
- B. The Shift Manager, who assumes the role of Emergency Coordinator, is listed in Table II-2 as having the responsibility for approving the release of information to the public regarding an emergency at Comanche Peak. However, this responsibility is not included as part of the discussion in Section B of the Emergency Plan. Explain why this information was not included in the detailed responsibilities of the Emergency Coordinator in Section B of the Emergency Plan. also discuss whether this responsibility can be delegated.
- C. Discuss the on-shift and augmented staffing levels provided in Table II-2 for each unit. Table II-2 should clearly show any sharing of staffing between each unit.
- D. Discuss whether the personnel assigned to the fire brigade will also perform ERO functions as collateral duties. Table II-2 and Section B of the Emergency Plan should describe these collateral duties and which member of the fire brigade will perform them and the impact on the ERO to perform its functions.
- E. The two columns titled, "Capabilities for Addition," that relate to augmentation staffing times in Table II-2 of the Emergency Plan are represented as 40 minutes and 70 minutes versus 30 minutes and 60 minutes as specified in Table B-1, "Minimum Staffing Requirements for NRC Licensees for Nuclear Power Plant Emergencies," of NUREG-0654/FEMA-REP-1. Provide staffing times consistent with NUREG-0654/FEMA-REP-1 or discuss why the extended augmentation times are acceptable for each function / task.
- F. Several positions (Mechanic, Electrician, I&C Technician) are identified with a note (f), which states that on-shift staffing is provided in Technical Specifications for these positions. Since the minimum on-shift maintenance staffing available for emergency response functions is not addressed in Technical Specifications, revise Table II-2 to identify the on-shift maintenance (Mechanical, Electrical, Instrumentation and Control) minimum staffing available for repair and corrective actions during an emergency.
- G. The on-shift Radiation Protection Technician (RPT) personnel responsible for on-site surveys and in-plant surveys are identified in Table II-2 with a note (f) that states the on-shift staffing is provided in Technical Specifications for these positions. Technical Specifications state that an RPT shall be onsite when fuel is in the reactor, and a single RPT may fulfill the requirements for both units. In addition, Table II-2 identifies two RPTs responsible for protective actions as part of the Radiological Accident Assessment and Support function that may be provided by on-shift or augmentation personnel assigned other functions.

G-1. The footnote (f) allows for no RPT staffing being present on-site when both reactors are defueled. If a declared emergency occurs with the reactors in this condition, discuss who would perform the functions of in-plant surveys, on-site surveys, and protective actions during this time.

G-2. Clarify the on-shift RPT staff that will perform in-plant surveys, on-site surveys, and protective actions as part of the overall Radiological Accident Assessment and Support function.

G-3. Explain why there are no augmentation RPT personnel to perform on-site (out-of-plant) surveys.

H. Section B of the Emergency Plan states that on-site Survey Teams initially shall be composed of at least two members, at least one of which shall be a Radiation Protection Technician. Clarify who will assume the role of the second team member position based on the minimum shift staffing provided in Table II-2.

I. Section B of the Emergency Plan states that Chemistry Technicians will perform in-plant chemistry sampling and analysis and function as part of the First Aid Team if there is an emergency at Comanche Peak until relieved by other members of the ERO. Table II-2 identifies the on-shift minimum chemistry staffing with a note (f), which states that the on-shift staffing is provided in Technical Specifications for these positions. Technical Specifications do not require chemistry personnel to be on-site when both units are in modes 5, 6, or defueled.

I-1. Discuss who will perform the in-plant chemistry sampling and analysis, and participate as part of the First Aid Team if both units are in modes 5, 6, or defueled, and there is an emergency at Comanche Peak.

I-2. Provide the rationale for assigning Chemistry technicians a collateral task on the First Aid Team.

J. Table II-2 in the Emergency Plan indicates that the on-shift shift technical advisor (STA) will perform the major tasks of dose assessment and technical support. In addition, the STA position in Table II-2 is identified with note (a), which states that these tasks may be provided by on-shift or augmentation personnel assigned other functions. However, footnote (e) provided in FSAR Table 13.1-202, "Minimum Shift Crew Composition," states that the STA position may be filled by an on-shift SRO provided that an individual meets the dual role requirements described in the Commission Policy Statement on Engineering Expertise on-Shift and has dose assessment capability. Section B of the Emergency Plan states that the STA provides engineering expertise and advice regarding plant transient analysis, accident mitigation, core/thermal hydraulics, and other matters related to operational safety, including dose assessment.

J-1. Explain the rationale for assigning the on-shift STA the potentially competing responsibilities of dose assessment and Engineering Technical support. In the discussion, address the training needed, and qualification process, for the STA to be assigned the off-site dose assessment task.

J-2. Table II-2 does not include an augmentation responder for the Core / Thermal Hydraulics area of expertise. Discuss the on-shift compensation for providing this expertise or add an augmentation responder to Table II-2 of the CPNPP Emergency Plan.

K. Table B-1 of NUREG-0654/FEMA-REP-1 identifies the need to augment the Electrical / I&C Maintenance capability within 30 minutes. Explain why Table II-2 does not include this capability.

L. Table B-1 of NUREG-0654/FEMA-REP-1 identifies the need for Electrical and Mechanical Technical support within 60 minutes. Discuss the electrical and mechanical technical expertise of the four TSC Engineering team members identified as 70-minute augmentation staff in Table II-2.

13.03-4

SITE-5: Notification Methods and Procedures

Basis: 10 CFR 50.47(b)(5); Planning Standard E., 10 CFR 50, Appendix E.IV.D.1, 10 CFR 50, Appendix E.IV.D.3, 10 CFR 50.72(a)(3), 10 CFR 50.72(c)(3), NUREG-0654/FEMA-REP-1, Evaluation Criterion E.1, 2, 3, 4, 5, 6, 7

SRP ACCEPTANCE CRITERIA (NUREG-0800, section 13.3): Requirement A, B, C, D, E, F Acceptance Criterion 1-31

E-1. Appendix 3, "Public Alert and Notification System Description," Section III.C, "Special Alerting Arrangements," of the CPNPP Emergency Plan states that alerting requirements for industrial facilities and institutions were determined with consideration to existing alerting mechanisms. Discuss whether systems designed for other purposes are adapted to incident alert notification at CPNPP. Include this information in the Emergency Plan.

13.03-5

SITE-6 Emergency Communications

Basis: 10 CFR 50.47(b)(6), Planning Standard F; 10 CFR, Appendix E. IV.E.9; 10 CFR 50, Appendix E. IV.E.9; Generic Letter 91-14; 10 CFR 50.72(a)(4); NUREG 0654/FEMA-REP1; Evaluation Criterion F.1, F.2, F.3.

SRP ACCEPTANCE CRITERIA (NUREG-0800, section 13.3): Requirements A, B and F; Acceptance Criteria 1, 2, 6, 12, 23, 29, 30

F-1. Section II.F.1, "Description of Communication Links," lists multiple on-site and off-site communication systems; however, information is needed regarding the availability of backup power sources. Discuss the availability of backup power sources for on-site and off-site communication systems. Include this information in the Emergency Plan.

- F-2. Section II.F.1, "Description of Communication Links," states provisions are in place for the Emergency Notification emergency notification system (ENS), health physics network (HPN), and emergency response data system (ERDS). Discuss the availability of the RSCL, PMCL, MCL, and LAN. Include this information in the Emergency Plan.
- F-3. Section II.F.1, "Description of Communication Links," states provisions are in place for the ENS. Describe the backup power system available to the ENS. Include this information in the Emergency Plan.

13.03-6

SITE-7: 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, G.2, G.3, G.4, G.5

SRP ACCEPTANCE CRITERIA (NUREG-0800, section 13.3): Requirements A and B; Acceptance Criteria 1 and 2

- G-1. Section G.2, "Distribution and Maintenance of Public Information," states information intended for the transient population may include postings and publications provided in selected businesses, public buildings, recreational areas, hotels, motels, and campgrounds. Discuss how often public education and information materials are disseminated to selected businesses, public buildings, recreational areas, hotels, motels, and campgrounds. Include this information in the Emergency Plan.
- G-2. Section G.3, "News Media Coordination," provides information regarding the Joint Information Center (JIC). Discuss whether there is space for a limited number of news media at the near-site Emergency Operations Facility (EOF). Include this information in the Emergency Plan.

13.03-7

SITE 8: Emergency Facilities and Equipment

Basis: 10 CFR 50.47(b)(8), Planning Standard H; 10 CFR 50, Appendix E.IV.E.1 through 3; 10 CFR 52.79(a)(17), Three Mile Island Requirements; Appendix E.IV.E.4; Appendix E.IV.E.8; Appendix E.VI Emergency Response Data System; Appendix E.VI. Maintaining Emergency Response Data System; 10 CFR 50.34(f)(2)(xxv); 10 CFR 50, Appendix E.IV.G.; Supplement 1 to NUREG-0737, "Clarification of TMI Action Plan Requirements," NUREG-0654/FEMA-REP-1, Evaluation Criterion H1 through H12

SRP ACCEPTANCE CRITERIA (NUREG-0800, section 13.3): Requirements A and B; Acceptance Criteria 1, 2, 4, 5, 12, 25, and 26

- H-1. Section N.2.a, "Communications Drills," (page II-79) states that communications between CPNPP and Federal agencies and the State of Texas are tested quarterly; however, ERDS is not specifically stated to be tested quarterly. Clarify whether ERDS will be tested quarterly. Include this information in the Emergency Plan.
- H-2. Section 9.5.2.2, "System Description," of Section 9.5.2, "Communication Systems," of the US-APWR Design Control Document (DCD) (page 9.5-19) lists and describes the physically independent communication systems, and states emergency telephones are dedicated for the emergency notification system, local and state notification, health physics network, plant security and Offsite support center. Clarify whether the "Offsite support center" listed in DCD Section 9.5.2.2.2 is the Operations Support Center (OSC). If not, discuss whether there are emergency telephones used for communication to the Operations Support Center. Include this information in the Emergency Plan.
- H-3. Section H.1, "On-Site Emergency Response Facilities," "Technical Support Centers," (page II-46) states that display capability in the TSC includes a workstation that provides a minimum required Safety Parameter Display System (SPDS) parameters. Discuss how the TSC data will provide at least 2 hours of pre-event and 12 hours of post-event data, consistent with NUREG-0696. Include this information in the Emergency Plan.
- H-4. Section H.2 states that the EOF is sized to provide work space for EOF assigned personnel, Data Display Equipment, communication equipment and access to it, storage and access to plant records and historical data, and private space for NRC consultations; however, information is needed regarding the reliability of the electrical supply relative to vital EOF functions or data storage or data system unavailability.
- A. Discuss whether circuit transients or power supply failures and fluctuations will result in a loss of stored data vital to the EOF functions. Include this information in the Emergency Plan.
 - B. Discuss whether data storage for the EOF data is sufficient to store at least 2 hours of pre-event data and 12 hours of post-event data. Include this information in the Emergency Plan.
 - C. Discuss whether the EOF data system unavailability is less than 0.01 during all plant conditions above cold shutdown, as discussed in NUREG-0696. Include this information in the Emergency Plan.
- H-5. Section H.2, "Off-site Emergency Response Facilities, Emergency Operations Facility," (page II-49) states that security protection is upgraded to restrict access to personnel assigned to the EOF when it is activated, but information is needed regarding security during non-activated times, to ensure its readiness for use. Discuss whether the EOF has industrial security during non-activated times. Include this information in the Emergency Plan.

- H-6. Section H.1, "On-Site Emergency Response Facilities," "Technical Supports Centers," (page II-47) states that display capabilities in the TSC includes a workstation that is capable of displaying parameters required for a Safety Parameter Display System (SPDS); however, information is needed regarding the reliability of equipment. Section H.2, "Off-Site Emergency Response Facilities," (page II-48) states that the EOF also has technical data displays; however, information is needed regarding the reliability of equipment. Discuss whether data indicators and associated circuitry in the TSC and EOF are of a reliable design. Include this information in the Emergency Plan.
- H-7. Section H.2, "Off-site Emergency Response Facilities, Emergency Operations Facility," (page II-48) states that the EOF has space for storage and access to plant records, historical data, procedures, emergency plans and references; however, additional information is needed regarding whether the drawings, diagrams, procedures and other references are accurate, complete and the current version, and whether the US-APWR Design Control Document (DCD) is available as a reference. Discuss whether the plant drawings, diagrams, procedures and other references are accurate, complete and the current version and whether the US-APWR Design Control Document (DCD) is available as a reference at the Emergency Operations Facility (EOF). Include this information in the Emergency Plan.
- H-8. TSC personnel are notified at an Alert or higher emergency classification and should activate the TSC as soon as possible with a goal of 60 minutes. Discuss how the goal of 60 minutes to activate the Technical Support Center (TSC) meets the guidance in NUREG-0696, Section 2.3, "Staffing and Training," which states that the TSC shall achieve full functional operation within 30 minutes. Include this information in the Emergency Plan.
- H-9. Section H.2, "Off-site Emergency Response Facilities," (page II-48) states that the EOF is designed and equipped for continuous operations over an extended time period; however, information is needed regarding the indoor environmental system. Describe the environmental or heating, ventilation, and air conditioning (HVAC) system that provides temperature, humidity and cleanliness suitable for personnel and equipment in the EOF. Include this information in the Emergency Plan.

13.03-8

SITE-9: Accident Assessment

Basis: 10 CFR 50.47(b)(9), Planning Standard I.; 10 CFR 50, Appendix E.IV.B; 10 CFR 52.79(a)(17), Three Mile Island Requirements; NUREG-0654/FEMA-REP-1, Evaluation Criterion I.1 through I.11; Supplement 1 to NUREG-0737, Section 6.1.b - Control Room Post-accident sampling capability

SRP ACCEPTANCE CRITERIA (NUREG-0800, section 13.3): Requirement A; Acceptance Criteria 1, 4, 5, 25, and 27

- I-1. Section I.1, "Parameters Indicative of Emergency Conditions," states Appendix 1, "Emergency Action Levels," includes the various indications that correspond to the emergency plant system and effluent parameter values that are indicative of off-normal conditions based on the methodology provided in NEI 99-01. Propose an ITAAC or License Condition that will ensure that the final version of the initial emergency action levels will be discussed with, and agreed upon with, state and local governmental authorities.

13.03-9

SITE-10: Protective Response

Basis: 10 CFR 50.47(b)(10); Planning Standard J., 10 CFR 50, Appendix E.IV; NUREG-0654/FEMA-REP-1, Evaluation Criterion J.1; Evaluation Criterion J.2; Evaluation Criterion J.1 through 12; RIS 2003-12, Clarification of NRC Guidance for Modifying Protective Actions.

SRP ACCEPTANCE CRITERIA (NUREG-0800, section 13.3): Requirements A and B; Acceptance Criteria 1 and 2

- J-1. Onsite individuals will be notified by audible warnings (page II-58); however, in high noise areas other measures may be used. Describe the other measures used to notify individuals in high noise areas, and include this in the Emergency Plan.
- J-2. Evacuees are directed to the designated relocation site. Describe the designated relocation site and provide letters of commitment if the site(s) is not under owner control. Include this information in the Emergency Plan.
- J-3. Section J.10, "Protective Measures Implementation," (page II-64) states that emergency plan procedures (EPPs) provide locations of pre-selected radiological sampling and monitoring points. Provide a map that shows the pre-selected sampling and monitoring points. Include this information in the Emergency Plan.
- J-4. Section J.10.m states that the choices of recommended protective actions are based on guidance provided in NUREG-0654, Supplement 3. Table II-3, "Protective Action Guides," (page II-64) identifies evacuation as the PAR when the projected dose is exceeded. However, information is needed regarding how the evacuation time estimate (ETE) is used in the decision to implement an evacuation PAR. Describe how the ETE is used in the determination of the PAR. Include this information in the Emergency Plan.

13.03-10

SITE-11: Radiological Exposure Control

Basis: 10 CFR 50.47(b)(11); Planning Standard K., 10 CFR 50, Appendix E (none), NUREG-0654/FEMA-REP-1; Evaluation Criterion K.1 through 7.

SRP ACCEPTANCE CRITERIA (NUREG-0800, section 13.3): Requirements A and B; Acceptance Criteria 1 and 2

K-1. Clarify whether the EOF (Emergency Operations Facility) Radiological Protection Coordinator in Section K.2 is the same as the Emergency Operations Facility Radiation Protection Coordinator as listed in Section B.5, "Plant Emergency Response Positions." Include this information in the Emergency Plan.

K-2. Section K.2 identifies Chapter 12 of the CPNPP Units 3 and 4 FSAR as describing the Radiation Protection Program (RPP). FSAR Section 12.5, "Operational Radiation Protection Program," CP COL 12.1(5) states that the contents in DCD Section 12.5 are replaced with text incorporating NEI 07-03. "Generic FSAR Template Guidance for Radioactive Protection Program Description," Revision 5 by reference. None of these sections or references describes procedures that would be in place to facilitate allowing increased dose. Identify the procedure titles and describe the general contents of procedures that would govern the decision-making to allow volunteers to receive doses in excess of routine limits during an emergency. Include this information in the Emergency Plan.

13.03-11

SITE-13: Recovery and Reentry Planning and Post-accident Operations

Basis: 10 CFR 50.47(b)(13); Planning Standard M., 10 CFR 50, Appendix E.IV.H., NUREG-0654/FEMA-REP-1; Evaluation Criterion M.1 through 4.

SRP ACCEPTANCE CRITERIA (NUREG-0800, section 13.3): Requirement A; Acceptance Criterion 1

M-1. Operations Support personnel are identified as having the responsibility for analyzing and developing plans and procedures to support restoration of the site to operational status, but positions and authorities of key Operations Support and Technical Support personnel need to be provided. Identify the position/title and authorities of key positions of the Operations Support staff and Technical Support staff that have responsibility for analyzing and developing plans and procedures to support restoration of the site to operational status. Include this information in the Emergency Plan.

13.03-12

SITE-14: Exercises and Drills

Basis: 10 CFR 50.47(b)(14); Planning Standard N, 10 CFR 50, Appendix E.IV.F.2., NUREG-0654/FEMA-REP-1; Evaluation Criterion N.1 through N.5.

SRP ACCEPTANCE CRITERIA (NUREG-0800, section 13.3): Requirements A and B; Acceptance Criteria 1 and 2

- N-1. Section N.1.b, "Exercise Scenarios and Participation," describes the biennial exercises but does not discuss remedial exercises. Provide information regarding remedial exercises and include this information in Emergency Plan.

- N-2. Section N.2.d, "Radiological Monitoring Drills," states that radiological monitoring drills include collection and analysis of all sample media and provisions for communications and record keeping; however, the Emergency Plan does not specify the frequency of the testing. Discuss whether radiological drills are conducted annually and include this information in the Emergency Plan.

13.03-13

SITE-15: Radiological Emergency Training

Basis: 10 CFR 50.47(b)(15); Planning Standard O., 10 CFR 50, Appendix E.IV. F.1, Appendix E.IV. F.2.g; NUREG-0654/FEMA-REP-1, Evaluation Criterion O.1. through 5.

SRP ACCEPTANCE CRITERIA (NUREG-0800, section 13.3): Requirements A and B; Acceptance Criteria 1 and 2

- O-1. Specialized training is provided for first aid and rescue personnel as described in Section O.3, "First Aid Response." Discuss whether the training provided to the first aid team is equivalent to the Red Cross "first responder" training. Include this information in the Emergency Plan.

- O-2. Specialized training is provided for personnel responsible for accident assessment as described in Section O.4, "Emergency Response Training and Qualification," for accident assessment personnel; however, control room shift personnel are not identified. Explain whether specialized initial training and periodic retraining is provided to control room personnel. Include this information in the Emergency Plan.

13.03-14

SITE-17: Response to Hostile Actions

Regulatory Basis: 10 CFR 52.79(a)(41); 10 CFR 50.54(hh)(1)

SRP Acceptance Criteria (NUREG-0800, section 13.3): Requirement G; Acceptance Criteria 30

Q-1. Provide the title of the procedure that will address actions in response to a security event, based on February 25, 2002 ICM order and NRC Bulletin 2005-02, 'Emergency Preparedness and Response Plans for Security Events,' dated July 18, 2005, and any specific site needs to the list of emergency plan implementing procedures in Appendix 5, "Emergency Plan Procedures," to the Comanche peak Emergency Plan.

13.03-15

SITE – 18: ITAAC

Regulatory Basis: 10 CFR 50.47; 10 CFR 52.80(a)

SRP Acceptance Criteria (NUREG-0800, section 13.3): Requirement E; Acceptance Criterion 23

S-1. Regulatory Guide (RG) 1.206 Table C.II.1-B1, "Emergency Planning-Generic Inspection, Test, Analyses, and Acceptance Criteria (EP-ITAAC)," provides an acceptable set of generic emergency planning ITAAC. Table B-2 of the COL application EP-ITAAC does not address nine generic ITAAC Planning Standards, listed below. Revise the ITAAC to address these ITAAC, or explain why they are not required.

1. Assignment of Responsibility – Organizational Control
2. Onsite Emergency Organization
3. Emergency Response Support and Resources
4. Radiological Exposure Control
5. Medical and Public Health Support.
6. Recovery and Reentry Planning and Post-Accident Operations
7. Radiological Emergency Response Training
8. Responsibility for the Planning Effort: Development, Periodic Review, and Distribution of Emergency Plans
9. Implementing Procedures

S-2. In COL application Part 10, Table B-2, "Emergency Plan Inspection, Tests, Analyses, and Acceptance Criteria", the acceptance criteria are prefaced with the phrase, "A Report exists that confirms." In NRC Regulatory Issue Summary (RIS) 2008-

05, "Lessons Learned to Improve Inspections, Tests, Analyses, and Acceptance Criteria Submittal," dated February 27, 2008, the following guidance is provided in regard to the use of such a phrase.

If applicants use the phrase, "a report exists and concludes that....," they should consider specifying the scope and the type of report. For example, they should explain whether the scope of the report includes the design, the as-built construction (as reconciled with the design), or any other information.

Consistent with RIS 2008-05, discuss the type and scope of the reports cited in ITAAC Table B-2, including how the reports will serve to provide accurate and reliable confirmation that the acceptance criteria have been met for the as-built facility. In the alternative, provide a revised ITAAC table without the words "test records demonstrate" or "a report exists that confirms."

S-3. Table B-2, "Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria," Acceptance Criteria 2.1 in Part 10 of the COL Application does not include language regarding notification of State and Local agencies within 15 minutes. Revise Acceptance Criteria 2.1 to be consistent with Table C.II.1-B1 of RG 1.206, Acceptance Criteria 5.1, or propose an acceptable alternative.

S-4. Table B-2, "Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria," in Part 10 of the COL application, Acceptance Criteria 2.2 does not provide the specific acceptance criteria for determination of successful test completion of mobilizing the CPNPP emergency response organization. Revise Table B-2 Acceptance Criteria 2.2 to include the specific acceptance criteria, or explain why it is not required.

S-5. Table B-2, "Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria," in Part 10 of the COL Application, references Tier 1 of the US-APWR Design Control Document (DCD) Revision 0 for Program Elements 3.1, 3.2, and 5.1; Inspection, Test, Analyses 3.1, 3.2, and 5.1; and Acceptance Criteria 3.1, 3.2, and 5.1. However, the Tier 1 US-APWR Design Control Document (DCD) provided by the Licensee is Revision 1. Revise the previously listed sections to reflect DCD Revision 1, provide Revision 0 for reference use, or discuss why this reference is correct as written.

S-6. Table B-2, "Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria," in Part 10 of the COL Application, Acceptance Criteria 4.1 describes a Joint Information Center that is located in the Granbury City Hall. The acceptance criteria do not list the requirements of Appendix B of RG 1.206, which states "The licensee has provided space, which may be used for a limited number of news media." Revise Acceptance Criteria 4.1 to be consistent with RG 1.206 Acceptance Criteria 7.1, which includes the number of news media to be accommodated, or propose an acceptable alternative.

S-7. In RG 1.206, "Emergency Planning-Generic Inspection, Test, Analyses, and Acceptance Criteria (EP-ITAAC)," Table C.II.1-B1, acceptance criteria 8.1.6 and 8.1.7 include the bracketed statement that "The COL applicant will adopt design certification

criteria, if applicable, or otherwise specify OSC location and identify specific capabilities.” Table B-2, Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria,” In Part 10 of the COL application, acceptance criteria 5.1.2.1, and 5.1.2.2 do not take credit for DCD criteria, or list OSC specific capabilities. Revise the acceptance criteria to include the criteria listed in RG 1.206, or explain why it is not required.

S-8. Table B-2, “Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria,” in Part 10 of the COL application, Acceptance Criteria 6.2 does not include the complete criteria of RG 1.206, Acceptance Criteria, which states that in addition to the criteria listed in 6.2, it must also include the following: “and the magnitude of the release of radioactive materials based on plant system parameters and effluent monitors.” Revise the acceptance criteria to include the criteria listed in RG1.206, or propose an acceptable alternative.

S-9. Table B-2, “Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria,” in Part 10 of the COL application, Acceptance Criteria 6.3 does not include the complete criteria of RG 1.206, Acceptance Criteria, which states the licensee must possess the means “to continuously assess the impact of the release of radioactive materials to the environment”. Revise the acceptance criteria to include the criteria listed in RG1.206, or propose an acceptable alternative.

S-10. Table B-2, “Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria,” in Part 10 of the COL application, Acceptance Criteria 6.4 describes specified meteorological data being available to the control room, TSC, and EOF. RG 1.206, Table C.II.1-B corresponding Acceptance Criteria 9.4 describes the need to demonstrate the ability to communicate meteorological data to the control room, TSC, EOF, offsite NRC center and to the state. Revise Acceptance Criteria 6.4 to be consistent with Table C.II.1-B Acceptance Criteria 9.4 or, propose an acceptable alternative.

S-11. Table B-2, “Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria,” in Part 10 of the COL application, Acceptance Criteria 8.1.2.2 addresses RG 1.206 Table C.II.1-B1 Acceptance Criteria 14.1.2, however, it does not include the word “successfully”, as it relates to emergency responder performance. Revise the acceptance criteria to include the word “successfully” or explain why it is not required.

S-12. In RG 1.206, “Emergency Planning-Generic Inspection, Test, Analyses, and Acceptance Criteria (EP-ITAAC),” Table C.II.1-B1 acceptance criteria 14.1.1 includes the bracketed statement that “The COL applicant will identify exercise objectives and associated acceptance criteria.” Table B-2, Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria,” In Part 10 of the COL application, Planning Standard 8.0, Exercises and Drills, Acceptance Criteria 8.1.1.2 states that exercise objectives, including, including specific acceptance criteria, addressed each of the eight listed emergency planning program elements. However, Table B-2 does not identify what the exercise objectives and associated acceptance criteria are in order to clearly identify what the requirements are, and to provide the ability to determine whether they have been met. Revise the acceptance criteria to include specific exercise objectives and associated acceptance criteria, or explain why it is not required.

S-13. In RG 1.206, "Emergency Planning-Generic Inspection, Test, Analyses, and AcceptanceCriteria (EP-ITAAC)," C.II.1-B1 acceptance criteria 14.1.3 addresses offsite exercise objectives associated with the full participation exercise. However, Table B-2, "Emergency Plan Inspections, Tests, Analyses, and Acceptance Criteria," Part 10 of the COL application does not include acceptance criteria to reflect the offsite exercise objectives associated with the full participation exercise. Revise Table B-2 to include the appropriate acceptance criteria, or explain why it is not required.

S-14. In RG 1.206, "Emergency Planning-Generic Inspection, Test, Analyses, and Acceptance Criteria (EP-ITAAC)," Table C.II.1-B1 acceptance criteria 14.1.2 includes the bracketed statement that "The COL applicant will identify responsibilities and associated criteria." In Table B-2, Acceptance Criteria 8.1.2.1 and 8.1.2.2 do not identify any responsibilities and associated acceptance criteria, in relation to the onsite emergency response personnel successfully performing their assigned responsibilities. Revise Table B-2 Acceptance Criteria 8.1.2.1 and 8.1.2.2 to include the appropriate criteria, or explain why it is not required.

13.03-16

SITE-19: Emergency Plan Considerations for Multi-unit Sites

T-1. Regulatory Guide (RG) 1.206 states, in part, that if the proposed new reactor(s) is located on, or near, an operating reactor site with an existing emergency plan (i.e., multiunit site), and the emergency plan for the proposed new reactor(s) includes various elements of the existing plan, then the applicant should address the 9 elements as described in Section C.I.13.3.2, "Emergency Plan Considerations for Multi-unit Sites." Revise the plan to address the 9 elements as identified in RG 1.206 Section C.I.13.3.2.