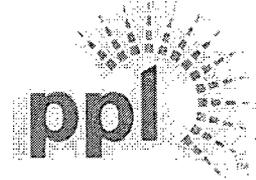


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September 25, 2009

ATTN: Ms. Vanessa E. Quinn
Chief, Radiological Emergency Preparedness Branch
Federal Emergency Management Agency
U.S. Department of Homeland Security
500 C Street, SW
Washington, D.C. 20472

**BELL BEND NUCLEAR POWER PLANT
RESPONSE TO FEMA REQUEST FOR
ADDITIONAL INFORMATION – SCHEDULE
BNP-2009-290 Docket No. 52-039**

- References:
- 1) Letter, R. R. Sgarro (PPL) to V. E. Quinn (FEMA), "Response to FEMA Request for Additional Information" (BNP-2009-243), dated August 28, 2009.
 - 2) Letter, V. E. Quinn (FEMA) to R. R. Sgarro (PPL), "Federal Emergency Management Agency (FEMA) Final Request for Additional Information (RAI) for the Bell Bend Nuclear Power Plant (BBNPP) Combined License (COL) Application", dated June 4, 2009.
 - 3) Letter, R. R. Sgarro (PPL) to V. E. Quinn (FEMA), "Response to FEMA Request for Additional Information – Schedule" (BNP-2009-068), dated September 16, 2009.

In a letter dated August 28, 2009 (Reference 1), PPL responded with proposed resolutions to FEMA's final request for additional information (Reference 2) regarding the Bell Bend Nuclear Power Plant (BBNPP) Combined License (COL) application. The purpose of this letter is to update you on our plan for providing final resolutions of those issues.

The attached document provides the resolution plans and completion dates we committed to provide. If you need further information, contact either R.R. Sgarro or R.M. Peal.

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Respectfully,


Rocco R. Sgarro

RRS/cw

Attachment: 1) FEMA RAI Responses Work Progress Tracking Table

cc: B. Freeman, FEMA Region III
D. Hammons, FEMA Region III
H. Tamanini, PEMA
R. Janati, PADEP/BRP
S. Collins, U.S. NRC Region I
M. Canova, U.S. NRC
D. Barss, U.S. NRC
U.S. NRC Document Control Desk (Docket No. 52-039)

Attachment 1

FEMA RAI Responses

Work Progress Tracking Table

FEMA RAI Responses
Work Progress Tracking Table

RAI Number	RAI Description	Response and Completion Status
BBNPP – 001	<p>A. Pennsylvania</p> <p>Commonwealth of Pennsylvania Emergency Operations Plan, Annex E, Appendix 5, <i>Radiological Exposure Control</i>, 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.</p>	<p>Under the revised Pa. Radiological / Nuclear Plan architecture, the only reference to dose will be in the BRP Plan. This will correct the inconsistency.</p> <p>This change will be completed by 01/15/2010.</p>
	<p>B. Risk Counties</p> <p>The Risk County RERPs, 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.</p>	<p>The Risk County Plans will be revised in accordance with PEMA Interim Radiological Plans Guidance, April 6, 2009, and will reflect the 5 Rem value.</p> <p>This change will be completed by 3/31/2010.</p>

<p>BBNPP – 002</p>	<p>A. Pennsylvania:</p> <p>Commonwealth of Pennsylvania Emergency Operations 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.</p>	<p>Luzerne County has begun discussions to locate the FRMAC at the AVOCA airport. PEMA and Luzerne County EMA will work with airport authorities to finalize the arrangements.</p> <p>Arrangements for these facilities and plan documents to support them will be completed by 3/31/2010.</p>
	<p>B. Risk Counties:</p> <p>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 RERPs 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.</p>	<p>Risk county plans will be changed to state that they will provide assistance to federal agencies providing emergency services.</p> <p>This change will be completed by 3/31/2010.</p>
	<p>C. Support Counties:</p> <p>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 Nuclear/Radiological Incident 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.</p>	<p>Support county plans will be changed to state that they will provide assistance to federal agencies providing emergency services.</p> <p>This change will be completed by 3/31/2010.</p>

BBNPP – 003	Dosimetry correction factor.	<p>Pennsylvania BRP procedure BRP-ER-A-7.0, Section 7.5.2.1, Emergency Worker Dose, has been modified to incorporate the appropriate guidance for dosimetry correction.</p> <p>No further action is planned.</p>
BBNPP – 004	<p>A. Pennsylvania.</p> <p>Commonwealth of Pennsylvania Emergency Operations Plan, Annex E, Appendix 11, Attachment A, <i>List of Designated MS-1 Hospitals Capable of Evaluation and Emergency Treatment of Contaminated Individuals</i> 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.</p>	<p>The list of MS1 hospitals will be included in the Pa. radiological / nuclear plan in ANNEX A, Appendix 3, Attachment A.</p> <p>This change will be completed by 01/15/2010.</p> <p>Luzerne and Columbia Counties will revise their county REP plans to reflect the current MS1 hospitals.</p> <p>This change will be completed by 3/31/2010.</p>
BBNPP – 005	<p>A. Pennsylvania.</p> <p>Commonwealth of Pennsylvania Emergency Operations Plan, Annex E, Appendix 11, Attachment J, <i>Hospitals Serving in a General capacity to the Susquehanna Steam Electric Station</i>, 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.</p>	<p>The Pennsylvania Department of Health website lists all hospitals within Pennsylvania. A search function is available for “County”, “Type”, etc.</p> <p>http://app2.health.state.pa.us/commonpoc/content/publiccommonpoc/commonpocselect.asp?formSubmitted=SearchByFacType&factype=01</p> <p>The Pennsylvania Radiological / Nuclear Plan will reference this website in Annex A, Appendix 3, Section 3.C.</p> <p>This change will be completed by 01/15/2010.</p>

	<p>B. Risk Counties</p> <p>The Risk County RERPs, Appendix 7, Attachment F <i>Hospitals Serving in General Support</i>, 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.</p>	<p>The Risk County Radiological / Nuclear Plans will be revised to specifically identify the appropriate MS1 hospital(s).</p> <p>This change will be completed by 3/31/2010.</p>
<p>BBNPP – 006</p>	<p>A. Pennsylvania</p> <p>A.1. Commonwealth of Pennsylvania Emergency Operations Plan; Annex E, Appendix 5, <i>Radiological Exposure Control</i>; Section 4.F, <i>Monitoring/ Decontamination Teams</i>, 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, <i>Protective Response; Surface Contamination Control</i>.</p>	<p>PEMA Interim Radiological Plans Guidance Memo dated April 6, 2009, Enclosure I, Section V.B.2 <i>Vehicle and Equipment Decontamination or Release Decision Criteria</i>. Contains guidance consistent with FEMA REP-22.</p> <p>Enclosure I will be incorporated into the Pa. Radiological / Nuclear plan, (Annex A) as Appendix 3.</p> <p>This change will be completed by 01/15/2010.</p>

	<p>A.2. Commonwealth of Pennsylvania Emergency Operations Plan, Annex , Section 2.G(8), <i>Monitoring Procedures for Vehicles</i>, 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, <i>Protective Response, Surface Contamination Control</i>.</p>	<p>PEMA Interim Radiological Plans Guidance Memo dated April 6, 2009, Enclosure I, Section V.B.2. <i>Vehicle and Equipment Decontamination or Release Decision Criteria</i>, Contains guidance consistent with FEMA-REP-22.</p> <p>Enclosure I will be incorporated into the Pa. Radiological/ Nuclear plan , (Annex A) , as Appendix 3.</p> <p>This change will be completed by 01/15/2010.</p>
<p>BBNPP – 007</p>	<p>A. Pennsylvania</p> <p>A.1. Commonwealth of Pennsylvania Emergency Operations Plan, Annex E, Appendix 5, <i>Radiological Exposure Control</i>, Section 4.F, <i>Monitoring/Decontamination Teams</i>; Section 9.X, <i>Definitions</i>, and Attachment A, Section 2.G, <i>Monitoring Procedures for Vehicles</i>, 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 <i>not</i> be used to monitor vehicles.</p>	<p>PEMA Interim Radiological Plans Guidance Memo dated April 6, 2009, Enclosure I, Section V.D <i>Survey Equipment Requirements</i>, and Attachment C, Section A.1 states that portal monitors are not permitted for the monitoring of vehicles. Enclosure II, Section II.B <i>Scope</i>, states that monitoring for vehicles and equipment should be done with hand held instruments only. The Pa. radiological / nuclear plan will be revised to incorporate this interim guidance.</p> <p>Enclosure I will be incorporated into the Pa. Radiological/ Nuclear plan, (Annex A), as Appendix 3.</p> <p>This change will be completed by 01/15/2010.</p>
	<p>B. Risk Counties</p> <p>Risk County RERPs, Appendix 13, <i>Radiological Exposure Control</i>, Attachment A, <i>Monitoring and Decontamination Procedures</i>, 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.</p>	<p>Risk county plans will be revised to incorporate this interim guidance.</p> <p>This change will be completed by 3/31/2010.</p>

<p>BBNPP – 008</p>	<p>A. Pennsylvania</p> <p>Commonwealth of Pennsylvania Emergency Operations 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.</p>	<p>The Pa. Radiological / Nuclear Plan will be revised to incorporate security threat language into Annex A, Section X.B.</p> <p>This change will be completed by 01/15/2010.</p>
	<p>B. Risk County</p> <p>Columbia County RERP, Enclosure 4 <i>Emergency Response Action Guidelines for the Four Classes of Incidents</i>, 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.</p>	<p>The Risk County Radiological / Nuclear Plan will be revised to incorporate security threat language consistent with the applicant's plan.</p> <p>This change will be completed by 03/31 / 2010.</p>
<p>BBNPP – 009</p>	<p>A. Pennsylvania</p> <p>A.1. Commonwealth of Pennsylvania Emergency Operations Plan; Annex E, Appendix 15, <i>Return and Recovery</i>, 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.</p>	<p>The Pa. Radiological / Nuclear Plan will be revised to incorporate interim guidance and clearly direct that occupational dose limits are provided by the BRP plan. The BRP plan is correct as written.</p> <p>This change will be complete by 01/15 / 2010.</p>

<p>BBNPP – 010</p>	<p>A. Pennsylvania</p> <p>Commonwealth of Pennsylvania Emergency Operations Plan, Annex E, Appendix 5 <i>Radiological Exposure Control</i>, 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.</p>	<p>The information provided with the KI contains information regarding storage and replacement.</p> <p>This item is closed based on Bell Bend project Letter BNP-2009-243 of August 28, 2009, and our conversation with FEMA Region III on September 14, 2009.</p>
<p>BBNPP – 011</p>	<p>A. Risk Counties</p> <p>Risk County RERPs, Appendix 12 <i>Mass Care</i> Section 4 <i>Requirements</i> 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.</p>	<p>The risk county plans will be reviewed to ensure that all references to mass care services consistently state 20% will need mass care.</p> <p>This change will be completed by 03/31/2010.</p>

<p>BNPP – 012</p>	<p>A. Risk Counties</p> <p>Risk County RERPs, Appendix 13 <i>Radiological Exposure Control</i>, 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.</p>	<p>Risk county plans will be revised to state that the primary post-decontamination monitoring method will be use of an appropriate hand-held instrument.</p> <p>This change will be completed by 03/31/2010.</p>
	<p>B. Support Counties (except Montour)</p> <p>Support County Nuclear/Radiological Incident Plans (except Montour), Appendix 4, Attachment F, Tab D <i>Post Decontamination Monitoring using Portal Monitors of Individuals found to be Contaminated</i>, 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.</p>	<p>Support county plans will be revised to state that the primary post-decontamination monitoring method will be use of an appropriate hand held instrument.</p> <p>This change will be completed by 03/31/2010.</p>

<p>BBNPP – 013</p>	<p>A. Risk Counties</p> <p>Risk County RERPs, 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.</p>	<p>The Risk County plans will be revised to specifically state where to find the listing of medical transport providers as well as the locations of the Letter of Agreement.</p> <p>This change will be completed by 3/31/2010.</p>
<p>BBNPP – 014</p>	<p>A. Risk Counties</p> <p>A.1 Luzerne County RERP, Appendix 20, <i>Agreements and Statements of Understanding</i>, includes descriptions of 14 agreements with transportation providers. Of the 14, the supplemental COL application 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.</p>	<p>Luzerne County will renew their memoranda of understanding with transportation providers. The memorandums will be available for inspection in the Luzerne County emergency management offices.</p> <p>This change will be completed by 3/31/2010.</p>
	<p>A.2 Columbia County RERP, Appendix 20, <i>Agreements and Statements of Understanding</i>, includes a description of an agreement with 1 transportation provider. The supplemental COL application 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.</p>	<p>Columbia County will renew their memoranda of understanding with transportation providers. The memos will be available for inspection in the Columbia County emergency management offices.</p> <p>This change will be completed by 3/31/2010.</p>

<p>BBNPP – 015</p>	<p>A. Pennsylvania</p> <p>Commonwealth of Pennsylvania Emergency Operations Plan, Annex E, Section 4 <i>Concept of Operations, G State Emergency Operations Center (EOC) Notification Procedures</i> 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.</p>	<p>Due to the fact that this document and responses contain personal phone numbers and information, and will become a public document, PEMA will not provide a copy of the SOP. Arrangements may be made for a representative to inspect the materials in PEMA offices.</p> <p>No further action is planned.</p>
	<p>B. Risk Counties</p> <p>B.1 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.</p>	<p>The referenced enclosures contain personnel listings and contact information rather than an implementing procedure. Alert and activation is performed by the County emergency management staff, and they are trained on alert and activation at least once per year. Because this document contains personal information and contact numbers, and will become a public document, it will not be submitted. It is available for inspection in the Luzerne County EMA offices.</p> <p>No further action is planned.</p>
	<p>B.2 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 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.</p>	<p>The referenced enclosures contain personnel listings and contact information. Because this document will become a public document, it will not be submitted. It is available for inspection in the Columbia County EMA offices.</p> <p>No further action is planned.</p>

	<p>Support Counties</p> <p>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.</p>	<p>Support County plans will be amended as necessary to describe the activation process.</p> <p>This change will be completed by 3/31/2010.</p>
<p>BBNPP – 016</p>	<p>A. Pennsylvania</p> <p>Commonwealth of Pennsylvania Emergency Operations 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.</p>	<p>The Pa. Radiological / Nuclear plan will be revised to state that the siren coverage design is in accordance with FEMA REP 1 (i.e. 100% of the population within 5 miles of the site).</p> <p>This change will be completed by 01/15/2010.</p>

<p>BBNPP – 017</p>	<p>A. Pennsylvania</p> <p>Commonwealth of Pennsylvania 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.</p>	<p>The attached file contains prepared messages for instances in which use of KI or agriculture advisories are deemed necessary. The Pa. State EOC releases the appropriate prepared message</p>  <p>im4511_2009072_2_160923.pdf</p> <p>No further action is planned.</p>
	<p>B. Risk Counties</p> <p>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.</p>	<p>The attached file contains prepared messages for instances in which use of KI or agriculture advisories are deemed necessary. The Pa. State EOC releases the appropriate prepared message</p>  <p>im4511_2009072_2_160923.pdf</p> <p>No further action is planned.</p>
	<p>A.2 The BRP RERP does not provide specific training requirements for individuals tasked with accident assessment responsibilities. Please provide specific training requirements for accident assessment personnel.</p>	<p>The Pa. Radiological / Nuclear plan will be revised to identify training requirements for State Agency personnel with accident assessment responsibilities.</p> <p>This change will be completed by 01/15/2010.</p>

<p>BBNPP – 020</p>	<p>A. Pennsylvania</p> <p>Commonwealth of Pennsylvania 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 emergency information:</p>	<p>The Pa. Radiological / Nuclear plan will be revised to identify training requirements for State Agency personnel with emergency information transmission responsibilities.</p> <p>This change will be completed by 01/15/2010.</p>
	<p>B. Risk Counties</p> <p>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:</p>	<p>Training for risk county personnel is specified in Pennsylvania Title 35 and detailed in PEMA Emergency Management Directive D2003 -5.</p> <p>Initial coursework is specified for several years, and continuing training is specified quarterly.</p> <p>No further action is planned.</p>
<p>BBNPP-021</p>	<p>A. Pennsylvania</p> <p>Commonwealth of Pennsylvania Emergency Operations Plan, Annex E, Appendix 17, <i>Training</i>, does not address annual retraining of State emergency response personnel. Please provide plan information addressing annual retraining of State emergency response personnel.</p>	<p>The Pa. Radiological / Nuclear plan will be revised to identify training requirements for State Agency personnel.</p> <p>This change will be completed by 01/15/2010.</p>

BBNPP-022	<p>A. Pennsylvania</p> <p>Commonwealth of Pennsylvania Emergency Operations Plan, Annex E, Appendix 5, <i>Radiological Exposure Control</i>, Attachment C, <i>Inventory and Maintenance Procedures</i> specifies annual, rather than quarterly, checks of equipment (other than communications equipment). Please provide amended plan pages specifying quarterly checks of equipment.</p>	<p>PEMA will state (either in a plan document or official correspondence) that equipment inventories will be checked quarterly, and equipment will be operationally checked quarterly.</p> <p>This change will be completed by 01/15/2010.</p>
	<p>B. Risk Counties</p> <p>Risk County RERPs, Appendix 13 <i>Radiological Exposure Control</i>, Attachment C <i>Inventory and Maintenance Procedures</i> specify annual, rather than quarterly, checks of equipment (other than communications equipment). Please provide amended plan pages specifying quarterly checks of equipment.</p>	<p>Risk county plans will be amended to specify quarterly equipment inventories and operational checks in accordance with FEMA REP 1.</p> <p>This change will be completed by 3/31/2010.</p>
	<p>C. Support Counties</p> <p>Support County Nuclear/Radiological Incident Plans; Appendix 5 <i>Inventory and Maintenance Procedures</i> specify annual, rather than quarterly, checks of equipment (other than communications equipment). Please provide amended plan pages specifying quarterly checks of equipment.</p>	<p>Support county plans will be amended to specify quarterly equipment inventories and operational checks in accordance with FEMA REP 1.</p> <p>This change will be completed by 3/31/2010.</p>
BBNPP-023	<p>A. Pennsylvania</p> <p>Commonwealth of Pennsylvania 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.</p>	<p>The Pa. Radiological / Nuclear plan will be revised to identify training requirements for State Agency personnel.</p> <p>This change will be completed by 01/15/2010.</p>

	<p>B. Risk Counties</p> <p>Risk County RERPs, Section 6 <i>Organization and Responsibilities</i>, 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.</p>	<p>Training for risk county personnel is specified in Pennsylvania Title 35 and detailed in PEMA Emergency Management Directive D2003-5.</p> <p>Initial coursework is specified for several years, and continuing training is specified quarterly.</p> <p>No further action is planned.</p>
	<p>C. Risk Municipalities</p> <p>Risk County Municipality RERPs, Section VII <i>Training and Exercises</i> 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.</p>	<p>Training for risk municipality personnel is specified in Pennsylvania Title 35 and detailed in PEMA Emergency Management Directive D2003-5.</p> <p>Initial coursework is specified for several years, and continuing training is specified quarterly.</p> <p>No further action is planned.</p>
	<p>D. Support Counties</p> <p>Support County Nuclear/Radiological Incident Plans 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.</p>	<p>Training for support county personnel is specified in Pennsylvania Title 35 and detailed in PEMA Emergency Management Directive D2003-5.</p> <p>Initial coursework is specified for several years, and continuing training is specified quarterly.</p> <p>No further action is planned.</p>

BBNPP-024	<p>A. Risk Municipalities</p> <p>Risk Municipality RERPs, Section IX <i>Plan Changes and Distribution</i>, A.1 do not specifically state that the agreements will be re-certified annually. Please provide information on annual re-certification of agreements.</p>	<p>Risk municipality plans will be revised as necessary to require that plans and agreements be reviewed annually and updated as needed. This will be certified annually in the report to the county EMA.</p> <p>This change will be completed by 3/31/2010.</p>
	<p>B. Support Counties</p> <p>Lackawanna, Northumberland, and Union County RERPs, 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.</p>	<p>Lackawanna, Northumberland, and Union County plans will be revised to specify annual review and update, as necessary.</p> <p>This change will be completed by 3/31/2010.</p>
BBNPP-025	<p>A. Risk Municipalities</p> <p>Risk Municipality RERPs, Section IX <i>Plan Changes and Distribution</i> 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.</p>	<p>Risk municipality plans will indicate the method to make changes between annual reviews.</p> <p>This change will be completed by 3/31/2010.</p>
BBNPP-026	<p>A. Risk Municipalities</p> <p>Risk Municipality RERPs do not include a listing of supporting plans. Please provide a listing of supporting plans.</p>	<p>Risk Municipality plans will be revised. To the extent possible, they will be written as stand-alone plans that require no reference to supporting plans or procedures. In instances where they do rely on supporting plans, those will be specified.</p> <p>This change will be completed by 3/31/2010.</p>

	<p>B. Support Counties</p> <p>Risk Municipality RERPs and Support County Nuclear/Radiological Incident Plans do not include a listing of supporting plans. Please provide a listing of supporting plans.</p>	<p>Risk Municipality and Support County plans will be revised. To the extent possible, they will be written as stand-alone plans that require no reference to supporting plans or procedures. In instances where they do rely on supporting plans, those will be specified.</p> <p>This change will be completed by 3/31/2010.</p>
<p>BBNPP-027</p>	<p>A. Pennsylvania</p> <p>Commonwealth of Pennsylvania Emergency Operations Plan, Appendix 22 <i>Supporting Plans and Implementing Procedures</i> 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.</p>	<p>Pa. Radiological / Nuclear plan (Annex A) is being revised. References to implementing procedures and the plan sections they support will be provided.</p> <p>This change will be completed by 01/15/2010.</p>
	<p>B. Risk Counties</p> <p>Risk County RERPs, Appendix 21 <i>Supporting Plans and Implementing Procedures</i>, 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.</p>	<p>Risk County radiological / nuclear plans are being revised. References to implementing procedures and the plan sections they support will be provided.</p> <p>This change will be completed by 3/31/2010.</p>

	<p>C. Risk Municipalities</p> <p>Risk Municipality RERPs, Section X <i>Standard Operating Procedures</i> 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.</p>	<p>Risk Municipality radiological / nuclear plans are being revised. References to implementing procedures and the plan sections they support will be provided.</p> <p>This change will be completed by 3/31/2010</p>
<p>BBNPP-028</p>	<p>A. Pennsylvania</p> <p>Commonwealth of Pennsylvania Emergency Operations Plan, Annex E, Section 4 <i>Concept of Operations, G State Emergency Operations Center (EOC) Notification Procedures</i> 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.</p>	<p>The Pa. Radiological / nuclear plan will be revised to require updates of phone lists at least quarterly.</p> <p>This change will be completed by 01/15/2010.</p> <p>Annex A will be revised to state that maps will be reviewed annually as part of the plan review and recertification, and changed when necessary.</p> <p>This change will be completed by 01/15/2010.</p>
	<p>B. Risk Counties</p> <p>B-1 Luzerne County RERP does not address the updating of maps. Please provide plan pages showing that maps will be updated quarterly.</p>	<p>Luzerne County plan will be revised to state that maps will be reviewed annually as part of the plan review and recertification, and changed when necessary. These changes will be completed by 3/31/2010.</p>

	<p>B.2 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.</p>	<p>Columbia county plan will be amended to require quarterly updates of phone lists. Columbia County plan will be revised to state that maps will be reviewed annually as part of the plan review and recertification, and changed when necessary. These changes will be completed by 3/31/2010.</p>
	<p>C. Risk Municipalities</p> <p>C.1 Risk Municipality RERPs, Section XI <i>Notification and Resource Manual</i>, Annex A, <i>Emergency Notification List</i>, 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.</p>	<p>Risk municipality plans will be revised to require updating phone lists quarterly. Risk Municipality plans will be revised to state that maps will be reviewed annually as part of the plan review and recertification, and changed when necessary. These changes will be completed by 3/31/2010.</p>
	<p>C.2 Nescopeck Township RERP, Annex A <i>Emergency Notification List</i> did not designate anyone to fill the key position of emergency management coordinator or deputy coordinator.</p>	<p>Luzerne County and SSES will work with Nescopeck Township to fill the EMA roles. These changes will be completed by 3/31/2010.</p>
	<p>D. Support Counties</p> <p>Support County Nuclear/Radiological Incident 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.</p>	<p>Support County plans will be revised to require updating phone lists quarterly. Risk Municipality plans will be revised to state that maps will be reviewed annually as part of the plan review and recertification, and changed when necessary. These changes will be completed by 3/31/2010.</p>

<p>BBNPP-029</p>	<p>A. Pennsylvania Commonwealth of Pennsylvania Emergency Operations Plan, Annex E, Appendix 7, Section 6, <i>References</i>; and Appendix 7, Attachment C, Tab 1, <i>Ingestion Protective Action Decision Points</i> incorrectly refer to and/or incorporate language from superseded 1982 FDA guidance. The current guidance document is <i>Accidental Radioactive Contamination of Human Food and Animal Feeds; Recommendations for State and Local Agencies</i> by FDA on August 13, 1998 (FDA 1998). Plan material should be amended as appropriate. Please provide corrected plan pages as specified.</p>	<p>Pa. Radiological / Nuclear Plan will be revised to incorporate and reference the revised guidance.</p> <p>This change will be completed by 01/15/2010.</p>
<p>BBNPP-029</p>	<p>B. Risk Counties Risk County RERPs, Appendix 15, Section 3.B, <i>Protective Actions</i>; Appendix 15, Section 3.C, <i>Notification</i>; and Appendix 15, Attachment C, <i>Ingestion Exposure Pathway Emergency Planning Zone</i>, Section 2.A-D incorrectly refer to and/or incorporate language from superseded 1982 FDA guidance. The current guidance document is <i>Accidental Radioactive Contamination of Human Food and Animal Feeds; Recommendations for State and Local Agencies</i> by FDA on August 13, 1998 (FDA 1998). Plan material should be amended as appropriate. Please provide corrected plan pages as specified.</p>	<p>Risk County Radiological / Nuclear Plans will be revised to incorporate and reference the revised guidance.</p> <p>These changes will be completed by 3/31/2010.</p>
	<p>C. Support Counties Support County Nuclear/Radiological Incident Plans, Appendix 9 (Appendix 3 in Montour County), Section 3.B, <i>Protective Actions</i>; Section 3.C, <i>Notification</i>; and Attachment C, <i>Ingestion Exposure Pathway Emergency Planning Zone</i>, Section 2.A-D incorrectly refer to and/or incorporate language from superseded 1982 FDA guidance. The current guidance document is <i>Accidental Radioactive Contamination of Human Food and Animal Feeds; Recommendations for State and Local Agencies</i> by FDA on August 13, 1998 (FDA 1998). Plan material should be amended as appropriate. Please provide corrected plan pages as specified.</p>	<p>Support County Radiological / Nuclear Plans will be revised to incorporate and reference the revised guidance.</p> <p>These changes will be completed by 3/31/2010.</p>

<p>BBNPP-030</p>	<p>A. Pennsylvania</p> <p>A.1: Commonwealth of Pennsylvania Emergency Operations Plan, Annex E, Appendix 7, Section 6, <i>References</i>; Appendix 7, Attachment C, Section C.1.f, <i>Food Protection, General</i>; and Appendix 7, Attachment C, Section C.2.F(1), <i>Drinking Water PAG Analogues</i> incorrectly refer to and/or incorporate language from superseded EPA drinking water guidance. The current drinking water guidance is 40 CFR 141.55, <i>National Primary Drinking Water Regulations, Radionuclide Rule</i> (EPA, December 7, 2000). Plan material should be amended as appropriate. Please provide corrected plan pages as specified.</p>	<p>This item is closed based on Bell Bend project Letter BNP-2009-243 of August 28, 2009, and our conversation with FEMA Region III on September 14, 2009.</p>
	<p>B. Risk Counties</p> <p>Risk County RERPs, Appendix 15, Section 5, <i>References</i>, and Appendix 15, Attachment C, <i>Ingestion-Exposure Pathway Emergency Planning Zone</i>, 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, <i>National Primary Drinking Water Regulations, Radionuclide Rule</i> (EPA, December 7, 2000). Plan material should be amended as appropriate. Please provide corrected plan pages as specified.</p>	<p>This item is closed based on Bell Bend project Letter BNP-2009-243 of August 28, 2009, and our conversation with FEMA Region III on September 14, 2009.</p>

	<p>C. Support Counties</p> <p>Support County Nuclear/Radiological Incident Plans, Appendix 9 (Appendix 3 in Montour County), Section 5, <i>References</i>, and Appendix 9 (Appendix 3 in Montour County), Attachment C, <i>Ingestion Exposure Pathway Emergency Planning Zone</i>, 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, <i>National Primary Drinking Water Regulations Radionuclide Rule</i> (EPA, December 7, 2000). Plan material should be amended as appropriate. Please provide corrected plan pages as specified.</p>	<p>This item is closed, based on Bell Bend project Letter BNP-2009-243 of August 28, 2009, and our conversation with FEMA Region III on September 14, 2009.</p>
<p>BBNPP-031</p>	<p>A. Pennsylvania</p> <p>Commonwealth of Pennsylvania Emergency Operations Plan, Annex E, Appendix 5, <i>Radiological Exposure Control</i>, 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).</p>	<p>The Pa. Radiological / Nuclear plan will be revised as necessary to reference the appropriate PADOH procedures.</p> <p>This change will be completed by 01/15/2010.</p>
<p>BBNPP-032</p>	<p>A. Pennsylvania</p> <p>Commonwealth of Pennsylvania Emergency Operations Plan, Annex E, Appendix 4, <i>Protective Response</i>, 6, <i>Evacuation Time Estimates</i>, 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.</p>	<p>The Pa. Radiological / Nuclear plan will be revised to incorporate changes from the revised ETE.</p> <p>This change will be completed by 01/15 / 2010</p>

	<p>B. Risk Counties Risk County RERPs, Appendix 10, Attachment B <i>Evacuation Time Estimates</i> do not contain information on traffic capacities of evacuation routes. Please provide amended plan pages incorporating information on traffic capacities of evacuation routes.</p>	<p>The Risk County Radiological / Nuclear plan will be revised to incorporate changes from the revised ETE.</p> <p>This change will be completed by 3/31/2010.</p>
BBNPP-033	<p>A. Risk Counties Risk County RERPs, Appendix 13 <i>Radiological Exposure Control</i> 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.</p>	<p>Risk County plans will be revised to provide the option to send school children to public monitoring and decontamination facilities or to send monitoring teams to the host schools.</p> <p>This change will be completed by 3/31/2010.</p>
	<p>B. Support County Montour County Nuclear/Radiological Incident Plans, Appendix 2 <i>Host School Operations</i> 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.</p>	<p>Support County plans will be revised to provide the option to send school children to public monitoring and decontamination facilities or to send monitoring teams to the host schools.</p> <p>This change will be completed by 3/31/2010.</p>
BBNPP-034	<p>A. Risk Municipalities A.1 The Butler Township/Conyngham Borough RERP has been adopted (signed) by Butler Township but not Conyngham Borough. Please provide evidence that Conyngham Borough has adopted the RERP.</p>	<p>Adoption (signature) of the subject RERP will be obtained from Conyngham Borough.</p> <p>This change will be completed by 3/31/2010.</p>

	A.2 The Huntington Township/New Columbus Borough RERP has been adopted (signed) by New Columbus but not Huntington Township. Please provide evidence that Huntington Township has adopted the RERP.	Adoption (signature) of the subject RERP will be obtained from Huntington Township. This change will be completed by 3/31/2010.
	A.3 The Nescopeck Township RERP 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.	The subject RERP will be revised to remove the "Draft" notation. This change will be completed by 3/31/2010.
BBNPP-035	A. Pennsylvania Commonwealth of Pennsylvania Emergency Operations 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.	The Annual Letter of Certification from PEMA to FEMA addresses Agreements. Agreements are available for inspection in the PEMA offices. No further action is planned.
BBNPP-036	A. Support Counties Support County Nuclear/Radiological Incident Plans do not contain block diagrams; the NUREG cross reference indicates that this diagram is "TBD."	Block Diagrams will be included in Support County plans. This change will be completed by 3/31/2010.
	B. Support Counties Support County Nuclear/Radiological Incident 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.	Summaries will be added to Support County plans. This change will be completed by 3/31/2010.

BBNPP-039	<p>A. Pennsylvania</p> <p>Commonwealth of Pennsylvania Emergency Operations 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 <i>Emergency Equipment Operational Checks and Maintenance</i>, 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.</p>	<p>Annex A will be revised to include the appropriate protective equipment for emergency workers.</p> <p>This change will be completed by 3/31/2010.</p>
	<p>C. Risk Municipalities</p> <p>Risk Municipality RERPs, Attachment 1-5 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).</p>	<p>Information specifying the protective equipment needs will be added to the Risk Municipality plans.</p> <p>This change will be completed by 3/31/2010.</p>
BBNPP-040	<p>A. Support Counties</p> <p>Support County Nuclear/Radiological Incident 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.</p>	<p>Support County plans will be revised to reference the communication systems available.</p> <p>This change will be completed by 3/31/2010.</p>

BBNPP-041	<p>A. Support Counties</p> <p>Support County Nuclear/Radiological Incident 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.</p>	<p>Support County plans will be revised to reference the communication systems available.</p> <p>This change will be completed by 3/31/2010.</p>
BBNPP-042	<p>A. Support Counties</p> <p>Support County Nuclear/Radiological Incident Plans do not address testing of the emergency communications system. Please provide information describing testing of the emergency communications system.</p>	<p>Support County plans will be revised to refer to testing requirements.</p> <p>This change will be completed by 3/31/2010.</p>
BBNPP-043	<p>A. Support Counties</p> <p>A.1 Support County Nuclear/Radiological Incident Plans (except Montour), Appendix 4, Section D.3 <i>Calculations of the Number of Personnel That Can be Monitored in 12 Hours</i>, 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.</p>	<p>Support County plans will be amended to reference and comply with PEMA Circular C2004 – 2 (as revised) and the interim guidance.</p> <p>This change will be completed by 3/31/2010.</p>

	<p>A.2 Northumberland and Schuylkill County Nuclear/Radiological Incident 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.</p>	<p>Both counties have portal monitors and REP-22 compliant hand-held devices.</p> <p>No further action is planned.</p>
<p>BBNPP-044</p>	<p>A. Pennsylvania</p> <p>Commonwealth of Pennsylvania Emergency Operations Plan, Annex E 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.</p>	<p>Per discussion with FEMA Region III, Bell Bend plans, including offsite plans, will be prepared and submitted for review, but they will not be issued until it is time for the first Bell Bend exercise. Prior to that time, the plans will be reviewed and updated with any changes that have occurred in the interim.</p> <p>These "draft for review only" plans will be completed by 3/31/2010.</p>
	<p>B. Risk Counties</p> <p>Risk County RERPs 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.</p>	<p>Per discussion with FEMA Region III, Bell Bend plans, including offsite plans, will be prepared and submitted to be issued for review, but they will not be issued until it is time for the First Bell Bend exercise. Prior to that time, the plans will be reviewed and updated with any changes that have occurred in the interim.</p> <p>These "draft for review only" plans will be completed by 3/31/2010.</p>