

**Summer EP Review TER Boilerplate with Response to Supplemental RAIs, under JCN Q4007 Task 30, Subtask 8.**

NRC RAI Number: **13.03-38**

**13.3.1C.F.4 Regulatory Basis: Generic Letter 91-14, "Emergency Communications,"**

**Technical Information in the Plan:** Appendix 1, "References," (pages Appendix 1-1/2) of the VCSNS Units 2 and 3 Emergency Plan lists NRC Bulletin 80-15 and NRC Generic Letter 91-14 however Reactor Safety Counterpart Link (RSCL), Protective measures Counterpart Link (PMCL), management Counterpart Link (MCL), and Local Area Network (LAN) were not discussed. In **RAI 13.03-20(B)** staff requested additional information on how VCSNS addressed RSCL, PMCL, MCL, and LAN communications paths. In a response letter dated May 8, 2009 (pg 37), the applicant stated that these communication lines are reserved for use by the NRC Site Response Team and VCSNS does not include utilization of these communication links in the Emergency Plan. Testing of these communication lines on a routine basis will be included in accordance with administrative procedures to be developed. In **Supplemental RAI 13.3-38** the staff requested the applicant provide a statement with regard to use of RSCL, PMCL, MCL, and LAN communications paths in the VCSNS Emergency Plan or provide justification for why the statement is not needed. In a response letter dated August 27, 2009, the applicant committed to revise the text on pages C-1 and Section C.1.d to include the following statement:

Communication pathways provided in each of these facilities include access to dedicated landline telephones, wireless telephones and FTS telephones as provided by the NRC and include the Reactor Safety Counterpart Link (RSCL), Management Counterpart Link (MCL), the Protective Measures Counterpart Link (PMCL), and the Local Area Network (LAN). These FTS lines are in place in the appropriate VCSNS emergency response facilities and are for use by the NRC Response Team upon their arrival. The VCSNS ERO does not normally utilize these communication links.

**Technical Evaluation:** The staff finds the additional information and textual revisions provided in response to **Supplemental RAI 13.03-38** to be acceptable. In response to **Supplemental RAI 13.03-38** the applicant provided revisions to the text on pages C-1 and Section C.1.d. **Confirmatory Action NRC Item 13.03-17** was created to track the proposed revisions.

**13.3.1C.F.5 Conclusion for Emergency Communications**

The staff has reviewed the onsite emergency plan and the applicant's responses to **RAIs 13.03-20 (A)(B)(C)** and **Supplemental RAI 13.03-38** with regards to Planning Standard F of NUREG-0654/FEMA-REP-1 and the requirements of 10 CFR 50.47(b)(6) and Section IV.E.9 of Appendix E to 10 CFR Part 50. Final determination regarding this planning standard will be based on verification of **Confirmatory Action NRC Items 13.03-08 and 13.03-17**.

NRC RAI Number: **13.03-39**

**13.3.1C.H.4 Regulatory Basis:** 10 CFR 50, Appendix E.IV., "Content of Emergency Plans." 10 CFR 50, Appendix E.IV.E.3. requires facilities and supplies at the site for decontamination of onsite individuals.

**Technical Information in the Emergency Plan:** Section k.6.b, "Contamination Control Measures," of the VCSNS Units 2 and 3 Emergency Plan states decontamination of personnel will be performed at decontamination areas located onsite. Temporary decontamination areas can also be set up inside at various locations. Showers and supplies to be used are provided onsite. Section H.12, "Emergency Equipment and Supplies," provides a general list of supplies kept in each facility. The emergency plan does not provide the location of decontamination facilities onsite or provide a list of supplies that are available for decontamination of personnel. Section 1.2.5, "Annex Building," (page 23) identifies decontamination facilities in the Annex building hot shop but it is not clear if this is the facility mentioned in the emergency plan. In **RAI 13.03-22(B)** the staff requested additional information on the location of decontamination facilities and supplies that will be available for decontamination of personnel. In a response letter dated May 8, 2009 (pg 42), the applicant stated that decontamination facilities and their location will be described in the Emergency Plan Implementing Procedures to be submitted within the required timeframe as required by the EP ITAAC. The procedures will also address decontamination materials. In **Supplemental RAI 13.03-39** the staff requested the applicant revise the VCSNS Emergency Plan to address the location(s) of onsite decontamination facilities and describe the decontamination supplies associated with these facilities as required by 10 CFR 50, Appendix E.IV.E.3. In a response letter dated August 27, 2009, the applicant committed to revise Section K.5.b of the VCSNS Emergency plan to include decontamination facility locations as discussed in the AP1000 DCD and a list of decontamination supplies that will be available.

**Technical Evaluation:** The staff finds the additional information and textual revisions provided in response to **Supplemental RAI 13.03-39** to be acceptable. In response to **Supplemental RAI 13.03-39** the applicant provided revised text for Section K.5.b of the VCSNS Emergency. **Confirmatory Action NRC Item 13.03-18** was created to track this proposed revision.

#### **13.3.1C.H.12 Conclusion for Emergency Facilities and Equipment**

The staff has reviewed the onsite emergency plan and the applicant's responses to **RAI 13.03-RAIs 13.03-22 (A)(1)(2), (B), (D)(1)(3), (E), (F), (G), and Supplemental RAI 13.03-39** in regards to Planning Standard H of NUREG-0654/FEMA-REP-1 and the requirements of 10 CFR 50.47(b)(8) and Section IV.E.1., E.2., E.3, E.4., E.8., G., and VI. of Appendix E to 10 CFR Part 50. Final determination regarding this planning standard will be based on verification of **Confirmatory Action NRC Items 13.03-09 through 13.03-14 and 13.03-18.**

NRC RAI Number: **13.03- 40**

### **13.3.1C.L Medical and Public Health Support**

#### **13.3.1B.L.1 Regulatory Basis: 10 CFR 50.47, "Emergency plans." 10 CFR 50.47(b)(12);**

**Technical Information in the Emergency Plan:** **[L.1.]** Section L.1, "Offsite Hospital and Medical Services," (pages L-1) of V.C. summer Nuclear Station (VCSNS) Units 2 and 3 Emergency Plan states that there are arrangements by letter of agreement with Palmetto Richland Hospital for receiving and treating contaminated or exposed persons requiring immediate medical care. Palmetto Richland Hospital is identified in the list of letters of agreement in Appendix 2 "Letters of agreement," (page Appendix 2-1). Section L.3, "Medical Service Facilities," discusses backup response for contamination and exposure injuries from the Radiation Emergency Assistance Center/Training Site (REAC/TS) in Oak Ridge Tennessee. In **RAI 13.03-24(B)** staff requested information to explain if there are arrangements for backup hospital or physician that can be used to treating contaminated or exposed persons requiring immediate medical care. In a response letter dated May 8, 2009 (pg. 49), the applicant stated that the back-up medical facility for contamination and exposure injuries is the REAC/TS. Personnel requiring treatment beyond that provided by the primary facility will be transported to REAC/TS with transportation provided by the county, State, or Federal Agencies. In **Supplemental RAI 13.03-40** the staff requested the applicant clarify whether REAC/TS as discussed in the VCSNS Emergency Plan or Newberry County Memorial Hospital as discussed in the South Carolina State Plan, will act as a backup for the treatment of contaminated injured individuals. In a response letter dated August 27, 2009, the applicant stated that an agreement exists between the State of South Carolina and Newberry Memorial Hospital to serve as a back-up for radiological-medical emergencies. The agreement is not with VCSNS; therefore the VCSNS Emergency Plan identifies REAC/TS in Oak Ridge, Tennessee as the back-up to Palmetto Richland Hospital.

**Technical Evaluation:** The staff finds the clarification provided in response to **Supplemental RAI 13.03-40** to be acceptable and therefore resolved.

### **13.3.1C.L.5 Conclusion for Medical and Public Health Support**

The staff has reviewed the onsite emergency plan and the applicant's response to **RAI 13.03-24(A), (B), and (C)**, and **Supplemental RAI 13.03-40** in regards to Planning Standard L of NUREG-0654/FEMA-REP-1 and the requirements of 10 CFR 50.47(b)(12) and Section IV.E.5., E.6., and E.7 of Appendix E to 10 CFR Part 50. Final determination regarding this planning standard will be based on verification of **Confirmatory Action NRC Item 13.03-12**.

NRC RAI Number: 13.03-42

COL Information Items

Basis: 10 CFR 50.47 and Appendix E to 10 CFR Part 50

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

COL Action Item

In **Supplemental RAI 13.03-42** the staff requested the applicant provide additional information in the VCSNS Emergency Plan on the timeliness of staffing the ERF and details defining when the ERF is activated and when it's fully operational. In a response letter dated August 27, 2009, the applicant cited Section H.5 in Rev 1 of the VCSNS Emergency Plan which provides a description for the activation of Emergency Response Facilities.

**Technical Evaluation:** The staff finds the additional information provided in response to **Supplemental RAI 13.03-42** to be acceptable and therefore resolved.

*(This may be an NRC RAI. I can't identify its location in the boilerplate that I have)*