Progress Energy

Serial: NPD-NRC-2009-246
December 18, 2009

10CFR52.79

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

**LEVY NUCLEAR PLANT, UNITS 1 AND 2**
**DOCKET NOS. 52-029 AND 52-030**
**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 075 RELATED TO COMMUNICATIONS SYSTEMS**

Reference: Letter from Tanya Simms (NRC) to Garry Miller (PEF), dated November 30, 2009, "Request for Additional Information Letter No. 075 Related to SRP Section 09.05.02 for the Levy County Nuclear Plant Units 1 and 2 Combined License Application"

Ladies and Gentlemen:

Progress Energy Florida, Inc. (PEF) hereby submits our response to the Nuclear Regulatory Commission's (NRC) request for additional information provided in the referenced letter.

A response to the NRC request is addressed in the enclosure. The enclosure also identifies changes that will be made in a future revision of the Levy Nuclear Plant Units 1 and 2 application.

If you have any further questions, or need additional information, please contact Bob Kitchen at (919) 546-6992, or me at (727) 820-4481.

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

Executed on December 18, 2009.

Sincerely,

John Elnitsky
Vice President
Nuclear Plant Development

Enclosure

cc : U.S. NRC Region II, Regional Administrator
Mr. Brian C. Anderson, U.S. NRC Project Manager

**Progress Energy Florida, Inc.**
P.O. Box 14042
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NRO

**Levy Nuclear Plant Units 1 and 2**
**Response to NRC Request for Additional Information Letter No. 075 Related to SRP Section 09.05.02 for the Combined License Application, dated November 30, 2009**

| NRC RAI # | Progress Energy RAI # | Progress Energy Response |
|---|---|---|
| 09.05.02-8 | L-0680 | Response enclosed – see following pages |
| 09.05.02-9 | L-0681 | Response enclosed – see following pages |
| 09.05.02-10 | L-0682 | Response enclosed – see following pages |

**NRC Letter No.:** LNP-RAI-LTR-075

**NRC Letter Date:** November 30, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI #:** 09.05.02-8

**Text of NRC RAI:**

This RAI question is supplemental to RAI No. 2226, Question 09.05.02-3. The staff requests that the information in Point No. 1 of the applicant's response to RAI 09.05.02-3 be added to the next revision of the LNP Emergency Plan or FSAR.

Levy County COL Emergency Plan (EP), Section F, Table F-1 lists the PE Low-band Radio, FDLE Radio and Portable UHF Radios. The EP only provides details on the portable UHF Radios. The table also states that the FDLE Radio is a "back-up system." As such, the staff requested that the applicant provide more details on all the various types of radio systems identified in the EP. In particular, the staff requested the applicant explicitly identify what system constitutes the Crisis Radio Management System and provide details on this system. The applicant provided a sufficient level of detail that satisfied the staff's initial query. The applicant provided the following information as part of its response to RAI 09.05.02-3:

1. The Emergency Plan crisis management radio is the Florida Department of Law Enforcement (FDLE) radio. The LNP portion of this radio system is powered by the normal 120-V ac power supply with the non-Class 1E dc and uninterruptible power supply system providing power on loss of the normal power supply.

As stated above, the staff finds the response from the applicant to be adequate for the original RAI question. However the applicant did not commit to adding the above-cited bullet point detail to either the Emergency Plan or the FSAR. The staff requests that the detail in this particular bullet be added to the next revision of the Emergency Plan or the FSAR. The regulatory basis for both the original RAI question and this supplemental question is 10 CFR 73.55(f).

**PGN RAI ID #:** L-0680

**PGN Response to NRC RAI:**

Information regarding the FDLE radio will be added to Section F of the Emergency Plan as F.1.b.5 in a future revision.

**Associated LNP COL Application Revisions:**

Levy COLA Part 5, Emergency Plan, Section F.1.b will be revised from:

"b. Communications with state/county governments within the emergency planning zones consist, of the following:

1. The Florida Emergency Satellite Communications System (ESATCOM) is an intrastate communications system that is operated by the State of Florida Division of Emergency Management in Tallahassee, Florida. The system connects the State

Warning Point-Tallahassee (SWPT), state agencies, all Florida counties; weather service forecast offices, nuclear facilities, and other select locations via a satellite communications link. Voice transmissions from any of the locations are received at all other locations. The satellite dish is located at LNP with connections to the Control Rooms, Technical Support Centers (TSCs), and Emergency Operations Facility (EOF). The LNP Control Room ESATCOM will provide back-up communications for notification of an emergency at LNP.

2. Private telephone capability to the county and state warning points/Emergency Operation Centers (EOCs).

3. Satellite telephone capability.

4. Dedicated radio networks to the state and county warning points/EOCs."

To read:

b. Communications with state/county governments within the emergency planning zones consist of the following:

1. The Florida Emergency Satellite Communications System (ESATCOM) is an intrastate communications system that is operated by the State of Florida Division of Emergency Management in Tallahassee, Florida. The system connects the State Warning Point-Tallahassee (SWPT), state agencies, all Florida counties; weather service forecast offices, nuclear facilities, and other select locations via a satellite communications link. Voice transmissions from any of the locations are received at all other locations. The satellite dish is located at LNP with connections to the Control Rooms, Technical Support Centers (TSCs), and Emergency Operations Facility (EOF). The LNP Control Room ESATCOM will provide back-up communications for notification of an emergency at LNP.

2. Private telephone capability to the county and state warning points/Emergency Operation Centers (EOCs).

3. Satellite telephone capability.

4. Dedicated radio networks to the state and county warning points/EOCs."

5. Florida Department of Law Enforcement (FDLE) radio. This is the Emergency Plan crisis management radio. The LNP portion of this radio system is powered by the normal 120-V ac power supply with the non-Class 1E dc and uninterruptible power supply system providing power on loss of the normal power supply."

**Attachments/Enclosures:**

None.

**NRC Letter No.:** LNP-RAI-LTR-075

**NRC Letter Date:** November 30, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI #:** 09.05.02-9

**Text of NRC RAI:**

This RAI question is supplemental to RAI No. 2226, Question 09.05.02-5. The staff requests clarification on the response the applicant provided to RAI 09.05.02-5 concerning what the applicant has documented as the location of the NRC Headquarters.

The staff initially requested the applicant provide details on how it is compliant with RIS-2001-11. The staff found that the level detail provided by the applicant to be adequate. However, upon reviewing the applicant's response to RAI 09.05.02-5, a potential discrepancy was discovered that requires clarification. The applicant states in its response the following:

COLA Part 5, Emergency Plan, Appendix 1, the first sentence of the definition of NRC Emergency Telecommunications System (ETS) will be revised from:
"The NRC Emergency Telecommunications System hot line is a dedicated telephone system that connects the plant with NRC headquarters in Bethesda, Maryland."

To read:
"The NRC Emergency Telecommunications System is an integrated telephone system that connects the plant with NRC headquarters in Bethesda, Maryland. It utilizes Voicenet for primary communications and commercial telephone line as the backup."

The staff finds the content of the modification adequate, but the applicant states that the NRC Headquarters is located in Bethesda, MD. Currently, the headquarters of the NRC is located in Rockville, MD. The regulatory basis for the original RAI question and this supplemental question is Appendix E to 10 CFR Part 50, Part IV.E(9).

**PGN RAI ID #:** L-0681

**PGN Response to NRC RAI:**

The Levy COLA Part 5, Emergency Plan will be updated to reflect the current location of the NRC headquarters in a future revision.

**Associated LNP COL Application Revisions:**

Levy COLA Part 5, Emergency Plan, Appendix 1, the first sentence of the definition of NRC Emergency Telecommunications System (ETS) will be revised from:

"The NRC Emergency Telecommunications System hot line is a dedicated telephone system that connects the plant with NRC headquarters in Bethesda, Maryland."

To read:

"The NRC Emergency Telecommunications System is an integrated telephone system that connects the plant with NRC headquarters in Rockville, Maryland. It utilizes Voicenet for primary communications and commercial telephone line as the backup."

**Attachments/Enclosures:**

None

**NRC Letter No.:** LNP-RAI-LTR-075

**NRC Letter Date:** November 30, 2009

**NRC Review of Final Safety Analysis Report**

**NRC RAI #:** 09.05.02-10

**Text of NRC RAI:**

This RAI question is supplemental to RAI No. 2226, Question 09.05.02-6. The staff requests that the applicant add the information it provided in its response to RAI 09.05.02-6 to the next revision of either the FSAR or the Emergency Plan.

Levy County COL Emergency Plan, Section F, states: "The Progress Energy Voicenet System interconnects all Progress Energy plants, major substations, and main offices, and is interconnected with the area public telephone. This communication service is available throughout the Progress Energy service area. The voicenet system is wholly owned and operated by Progress Energy." As such, the staff requested the applicant provide additional detail on the PE Voicenet System and specifically, whether the PE Voicenet System is considered to be the back up communications system to the ENS. The applicant provided the following detail within their response to RAI 09.05.02-6:

1. The Progress Energy Voicenet system routes calls independently of the local telephone lines that are used for the Emergency Notification System (ENS) function but can use these lines if available to route a call. This also allows the ENS function to be routed geographically independently of the local phone connections, thereby achieving the reliability required in RIS 2000-11.

2. Progress Energy Voicenet system is not a backup to ENS, but rather it is the primary connection for the ENS and the backup is the commercial telephone lines.

The staff finds that the information provided by the applicant is adequate. However, the applicant did not commit to adding this additional information to either the FSAR or the Emergency Plan. In order to close out this RAI supplemental question, the staff requests that the applicant add this information to either the FSAR or the Emergency Plan. The regulatory basis for both the original RAI and this supplemental RAI is Appendix E to 10 CFR Part 50, Part IV.E (9).

**PGN RAI ID #:** L-0682

**PGN Response to NRC RAI:**

Information regarding Voicenet will be added to Section F of the Emergency Plan in a future revision.

**Associated LNP COL Application Revisions:**

1. Levy COLA Part 5, Emergency Plan, Section F will be revised from:

   "F. EMERGENCY COMMUNICATIONS
   This section describes the communications systems and provisions for communications between the Site and principal response organizations, including state, local, and federal

agencies and also describes communications between the emergency response facilities.

Details describing operation and testing of communications systems is located in emergency plan implementing procedures.

Public Address (PA) System and Plant Telephones
The PA system consists of a network of phones and speakers strategically located throughout the plant. The plant telephones are operated in three modes using a switch control, touch-tone (pushbutton) phones, and/or a dialing code.

Commercial Telephones
Commercial telephones are located throughout the LNP. These phones operate through the Florida Telephone switchboard located in Leesburg, Florida.

PE Voicenet System
The Progress Energy Voicenet System interconnects all Progress Energy plants, major substations, and main offices, and is interconnected with the area public telephone system. This communication service is available throughout the Progress Energy service area. The voicenet system is wholly owned and operated by Progress Energy.

Portable UHF Radios
Portable UHF radios are available to emergency teams for limited communication on the LNP Site. During normal day shift operations, key plant staff personnel have UHF radios available for communication with the Control Rooms. These radios are the primary communications link during a fire.

This system utilizes UHF repeaters and antennas located in the plant to aid in radio communications. Earphones are provided in high noise areas."

To Read:

"F. EMERGENCY COMMUNICATIONS
This section describes the communications systems and provisions for communications between the Site and principal response organizations, including state, local, and federal agencies and also describes communications between the emergency response facilities.

Details describing operation and testing of communications systems is located in emergency plan implementing procedures.

Public Address (PA) System and Plant Telephones
The PA system consists of a network of phones and speakers strategically located throughout the plant. The plant telephones are operated in three modes using a switch control, touch-tone (pushbutton) phones, and/or a dialing code.

Commercial Telephones
Commercial telephones are located throughout the LNP. These phones operate through the Florida Telephone switchboard located in Leesburg, Florida.

Progress Energy Voicenet System
The Progress Energy Voicenet System interconnects all Progress Energy plants, major substations, and main offices. Voicenet serves as the primary connection for ENS and is interconnected with the area public telephone system. This communication service is available throughout the Progress Energy service area. The Progress Energy Voicenet system routes calls independently of the local telephone lines that are used for the Emergency Notification System (ENS) function but will use these lines if available to route a call. This also allows the ENS function to be routed geographically independently of the local phone connections, thereby achieving the reliability required in RIS 2000-11, *NRC Emergency Telecommunications System*. Backup for Voicenet is commercial telephone lines. The Voicenet system is wholly owned and operated by Progress Energy.

Portable UHF Radios
Portable UHF radios are available to emergency teams for limited communication on the LNP Site. During normal day shift operations, key plant staff personnel have UHF radios available for communication with the Control Rooms. These radios are the primary communications link during a fire.

This system utilizes UHF repeaters and antennas located in the plant to aid in radio communications. Earphones are provided in high noise areas."

2. Levy COLA Part 5, Emergency Plan, Appendix 2, References will have the following text added:

   "EE. Regulatory Issue Summary 2000-11, " NRC Emergency Telecommunications System"."

**Attachments/Enclosures:**
None