



Serial: NPD-NRC-2010-022
March 26, 2010

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. 083 RELATED TO
EMERGENCY PLANNING**

Reference: Letter from Denise L. McGovern (NRC) to Garry Miller (PEF), dated March 8, 2010,
"Request for Additional Information Letter No. 083 Related to SRP Section 13.3 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.

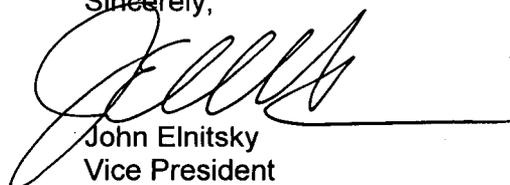
A response to the NRC request is addressed in the enclosure. The enclosure also identifies
changes that will be made in a future revision of the Levy Nuclear Plant Units 1 and 2 application.

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 March 26, 2010.

Sincerely,



John Elnitsky
Vice President
Nuclear Plant Development

Enclosure/Attachment

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

Levy Nuclear Plant Units 1 and 2
Response to NRC Request for Additional Information Letter No. 083 Related to
SRP Section 13.3 for the Combined License Application, dated March 8, 2010

<u>NRC RAI #</u>	<u>Progress Energy RAI #</u>	<u>Progress Energy Response</u>
13.03-36	L-0749	Response enclosed – see following pages
13.03-37	L-0750	Response enclosed – see following pages
13.03-38	L-0751	Response enclosed – see following pages
13.03-39	L-0752	Response enclosed – see following pages
13.03-40	L-0753	Response enclosed – see following pages
13.03-41	L-0754	Response enclosed – see following pages
13.03-42	L-0755	Response enclosed – see following pages
13.03-43	L-0756	Response enclosed – see following pages
13.03-44	L-0757	Response enclosed – see following pages

NRC Letter No.: LNP-RAI-LTR-083

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI #: 13.03-36

Text of NRC RAI:

Subject: Evacuation Time Estimate
Regulatory Basis: Appendix E to 10 CFR 50; Appendix 4 to NUREG-0654/FEMA-REP-1
Acceptance Criteria: 1, 2, 11

In Supplemental RAI 13.03-34, the staff requested that the information submitted in response to RAI 13.03-05(B)(2) be incorporated into the next revision to the LNP ETE report, which included a table and text. The response stated that a table similar to the one submitted will be incorporated into the next revision of the LNP ETE Report as appropriate based on ETE rulemaking and guidance in effect at the time of the revision. **Provide the table similar to Table-2, "Levy Nuclear Plant EPZ Population by Zip Code," with textual revisions in the next revision to the LNP ETE Report, as discussed in response to Supplemental RAI 13.03-34, or justify why this information is not required.**

PGN RAI ID #: L-0749

PGN Response to NRC RAI:

Table-2 with text as discussed in response to RAI 10.03-05(B)(2) will be incorporated into the next revision to the LNP ETE Report. The subject Table (Table F-2) and text is provided below.

Associated LNP COL Application Revisions:

The following change will be made to the Levy COLA in a future revision:

Revise the Levy Nuclear Plant Development of Evacuation Time Estimates Appendix F: Telephone Survey Section 2, Survey Instrument and Sampling Plan in the next LNP ETE Report from:

Attachment A presents the final survey instrument. A draft of the instrument was submitted for comment. Comments were received and the survey instrument was modified.

Following the completion of the instrument, a sampling plan was developed. Due to the close proximity of the Crystal River and Levy Nuclear Plants, a combined survey of the two EPZs was done in order to obtain demographic data useful for both plants. A sample size of approximately 553 completed survey forms yields results with an acceptable sampling error. The sample must be drawn from the EPZ population. Consequently, a list of zip codes within the combined Levy/Crystal River EPZ was developed. The population and number of households within each zip code area was estimated using geographical information systems (GIS) software. The list of zip codes considered, the Year 2000 population of each zip code, the number of households within each zip code and the proportional number of the desired completed survey interviews for each zip code are shown in Table F-1.

Table F-1. Combined Levy and Crystal River Nuclear Plants Telephone Survey Sampling Plan			
Zip Code	Population in ZIP (2000)	Households in ZIP (2000)	Required Sample
34428	8,920	3,779	151
34429	8,605	3,233	129
34431	6,664	3,176	127
34433	4,246	1,691	67
34449	3,908	1,979	79
34498	574		
Total:	32,917	13,858	553
Average Household Size			2.38
Total Sample Required			553

A combined telephone survey was performed for the existing Crystal River Nuclear Plant and the proposed Levy Nuclear Plant because of the close proximity of the facilities and the similar EPZ demographics.

To Read:

Attachment A presents the final survey instrument. A draft of the instrument was submitted for comment. Comments were received and the survey instrument was modified.

Following the completion of the instrument, a sampling plan was developed. The sample must be drawn from the EPZ population. Consequently, a list of zip codes within the combined Levy/Crystal River EPZ (Table F-1) and a list of zip codes for the Levy EPZ (Table F-2) were developed. Comparison of the final column in Table F-1 and the final column in Table F-2 shows that the distribution of phone calls is different amongst the zip codes; however, this is to be expected as the actual survey conducted using Table F-1 was a blend of the two EPZs, whereas Table F-2 focuses only on the Levy EPZ.

The population and number of households within each zip code area was estimated using geographical information systems (GIS) software. A sample size of approximately 553 completed survey forms yields results with an acceptable sampling error. The list of zip codes considered, the Year 2000 population of each zip code, the number of households within each zip code, and the proportional number of the desired completed survey interviews for each zip code is shown in Table F-1 and Table F-2.

Due to the close proximity of the Crystal River and Levy Nuclear Plants, a combined survey of the two EPZs was done in order to obtain demographic data useful for both plants.

Table F-1. Combined Levy and Crystal River Nuclear Plants Telephone Survey Sampling Plan			
Zip Code	Population in ZIP (2000)	Households in ZIP (2000)	Required Sample
34428	8,920	3,779	151
34429	8,605	3,233	129
34431	6,664	3,176	127
34433	4,246	1,691	67
34449	3,908	1,979	79
34498	574		
Total:	32,917	13,858	553
Average Household Size			2.38
Total Sample Required			553

Table F-2. Levy Nuclear Plant EPZ Population by Zip Code			
Zip Code	Population within EPZ (2000)	Households within EPZ (2000)	Required Sample
34428	3,793	1,526	106
34429	2	1	0
34431	6,186	2,820	197
34433	4,134	1,686	118
34434	168	71	5
34449	3,461	1,541	107
34465	7	4	0
34498	574	287	20
Total	18,325	7,936	553

Note that the Table F-1 combined zip codes 34449 and 34498 have 1,979 households within the combined study area, versus a total of 13,858 households for the whole study area. Thus, the sample size for these two zip codes is $1,979 \div 13,858 \times 553 = 79$. Table F-2 shows combined zip codes 34449 and 34498 have 1,828 households when using only the Levy EPZ versus a total of 7,936 households for the whole study area. Thus, the sample size for these two zip codes when considering only the Levy EPZ is $1,828 \div 7,936 \times 553 = 127$. Therefore, the required sample size increases even though the total households and population decrease. This anomaly is explained by the fact that the total households nearly doubles when using the combined study area versus only the Levy EPZ and the number of households in those zip codes makes up a larger percentage of the total households when just considering the Levy EPZ.

A combined telephone survey was performed for the existing Crystal River Nuclear Plant and the proposed Levy Nuclear Plant because of the close proximity of the facilities and the similar EPZ demographics. The survey sampling plan, as documented in Table F-1, achieves this goal, is valid and used as an input into the ETE results.

Attachments/Enclosures:

None.

NRC Letter No.: LNP-RAI-LTR-083

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI #: 13.03-37

Text of NRC RAI:

Subject: Security-based Considerations

Regulatory Basis: 10 CFR 50.47; Appendix E to 10 CFR 50; Regulatory Guide 1.206, Section C.I.13.3.1

Acceptance Criteria: 1, 2, and 30

Regulatory Guide 1.206 requests that applicants for a combined license address the NRC orders issued February 25, 2002, as well as any subsequent NRC guidance, to determine what security-related aspects of emergency planning and preparedness are addressed in the emergency plan.

1. NRC Bulletin 2005-02, "Emergency Preparedness and Response Actions for Security-Based Events," provides guidance for identifying alternative facilities to support emergency response organization augmentation during hostile-action events. **Describe in the emergency plan, or provide reference to where this information is contained, an alternative facility to support rapid response to a hostile-action event, or provide justification as to why this information is not necessary. As stated in BL 2005-02, the alternative facility should include the following characteristics:**
 - o **Accessibility even if the site is under threat or attack;**
 - o **Communication links with the emergency operations facility, control room, and security;**
 - o **Capability to notify offsite response organizations if the emergency operations facility is not performing this action;**
 - o **Capability for engineering and damage control teams to begin planning mitigative actions (e.g., general drawings and system information)**
2. NRC Bulletin 2005-02, "Emergency Preparedness and Response Actions for Security-Based Events," provides guidance for the prompt notification of the NRC during a security event to support subsequent notifications made by the NRC to warn other licensees regarding a potential security threat and to inform other Federal agencies in accordance with the National Response Plan. This notification should not be construed to imply that immediate notifications to local law enforcement will be adversely affected, or that the required licensee notification to State and local government agencies within 15 minutes after declaring an emergency will be changed. **Describe in the emergency plan/procedures, the notification to the NRC of hostile-action based events immediately after notification of local law enforcement agencies or within about 15 minutes following its recognition, or provide justification as to why this information is not necessary.**
3. Part 2, "FSAR," of the LNP COL application, Section 2.2, "Nearby Industrial, Military, and Transportation Facilities," provides a discussion regarding the potential effect on the plant from damage to nearby hazardous facilities, dams, and other nearby sites,

however, the potential effect to onsite staffing with augmentation, and onsite evacuation strategies in consideration of a security event is not addressed. **Clarify whether this evaluation has been performed and provide the location of where this evaluation has been considered in the LNP Emergency Plan. If this evaluation has not been performed, discuss the potential effect to onsite staffing with augmentation, and onsite evacuation strategies in consideration of a security event from damage to nearby hazardous facilities, dams, and other nearby sites. Address this evaluation in the LNP Emergency Plan accordingly, or justify why this information is not required.**

PGN RAI ID #: L-0750

PGN Response to NRC RAI:

1. Section H.2.3, Alternate Emergency Response Facility will be added to the LNP Emergency Plan in a future revision to Part 5 of the Levy COLA. The section addresses the characteristics needed for an alternate facility to support rapid response to a severe weather event, hostile-action event or any other situation that prevents the LNP Emergency Response Organization from responding to normal onsite facilities or onsite alternate facilities for the TSC and OSC.
2. NRC Bulletin 2005-02 provides guidance for the prompt notification to the NRC within about 15 minutes following the recognition of a hostile-action based threat against the facility. Section E.1.2.b, Nuclear Regulatory Commission (NRC) will be revised in a future revision to Part 5 of the Levy COLA to add the direction to notify the NRC within about 15 minutes immediately after notification of local law enforcement in the event of a hostile-action based threat against LNP. Specific actions to complete the NRC notification will be contained in emergency plan implementing procedures.
3. The LNP Emergency Plan adequately addresses the ability to classify, notify, and augment during emergencies regardless if the initiating condition originates onsite or offsite. In the scenario provided where a security or other event occurs at a facility nearby LNP Appendix 4, "Emergency Action Levels Table A4-4, Recognition Category H – Hazards or Other Conditions Affecting Plant Safety Initiating Condition Matrix" will be used to determine if the declaration of an emergency is warranted. Appendix 4 includes EALs for events such as toxic gases, chemicals, flammables, explosions, fires, etc. that are detrimental to normal LNP operations. The EAL initiating conditions are independent of point of origin and the Emergency Plan and actions described below will be implemented regardless if the event initiates onsite or offsite.

When an emergency classification is deemed necessary that requires activation of the LNP Emergency Response Organization (ERO) the emergency facilities would be staffed per one of two scenarios:

1. When ERO personnel are onsite as is the case during a normal work day the onsite facilities would be staffed as normal. An event at a nearby site is very unlikely to cause an immediate health concern or nuclear safety concern preventing personnel from commuting to onsite facilities such as the TSC or OSC. Ventilation systems and other onsite protective measures protect the staff upon arrival.
2. When ERO personnel are offsite as is typical during night time and weekends, notification is made to respond to the onsite facilities as normal. In the event access to the site is deemed hazardous then the ERO is notified to respond to the Alternate

Emergency Response Facility. Since the Alternate Emergency Response Facility is located approximately 10 miles from LNP it is not practical for meteorological conditions or a single event scenario at a nearby facility to prevent ERO response to both onsite and the alternate emergency response facility at the same time.

Notification and mobilization of the ERO is discussed in Section E of the LNP Emergency Plan. Section J, Protective Response provides additional direction to evacuate, relocate, stage, disperse or shelter personnel onsite based on the hazard present. The actions implemented are independent of the origination of the hazard.

The LNP Emergency Plan protects the public for scenarios that result in a nearby site causing an emergency declaration at LNP. No additional modification is needed for the LNP Emergency Plan due to nearby hazards identified in Part 2, "FSAR" Section 2.2.

Associated LNP COL Application Revisions:

The following changes will be made in a future revision to Part 5, Emergency Plan of the LNP COLA:

1. Add Section H.2.3, Alternate Emergency Response Facility as follows:

2.3 Alternate Emergency Response Facility

The Alternate Emergency Response Facility is located away from the plant site in the EOF/ENC Facility. The Facility will serve as a location for ERO members to assemble and activate in the event that access to the plant's onsite and alternate "onsite" Emergency Response Facilities (TSC and OSC) location is not possible due to a severe weather event, hostile-action or any other reason. The Facility is intended to be staffed short term during the period when the onsite facilities are not accessible and will contain minimal equipment necessary for operation. The facility will have at a minimum:

- Communication links with the EOF, control room and security
- Capability to notify offsite response organizations if the emergency operations facility staff is not performing the action
- Capability for engineering and damage control teams to begin planning mitigating actions (e.g., general drawings and system information)

Specific setup criteria for the Alternate Emergency Response Facility are contained in the EPIP, Activation and Operation of the Alternate Emergency Response Facility.

2. Revise the Table of Contents to add an entry for new section H.2.3, Alternate Emergency Response Facility.
3. Add the following to Appendix 5, List of Emergency Plan Supporting Procedures:
Activation and Operation of the Alternate Emergency Response Facility – Section H
4. Revise Section E.1.2.b. Nuclear Regulatory Commission (NRC) from:

Event notifications to the NRC will be made as soon as possible, and within one hour of the emergency classification. The primary means of communication between the LNP and the NRC is the Emergency Notification System (ENS). Commercial telephone lines are available as backup notification methods.

To Read:

Event notifications to the NRC will be made as soon as possible, and within one hour of the emergency classification.

In the event of a hostile-action based threat to LNP the NRC will be notified within about 15 minutes immediately after notification of local law enforcement. (Reference T)

The primary means of communication between LNP and the NRC is the Emergency Notification System (ENS). Commercial telephone lines are available as backup notification methods. Specific actions to complete the NRC notification will be contained in emergency plan implementing procedures.

Attachments/Enclosures:

None.

NRC Letter No.: LNP-RAI-LTR-083

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI #: 13.03-38

Text of NRC RAI:

Subject: Backup Means for Alert and Notification Systems (ANS)

Regulatory Basis: 10 CFR 50.47(b)(5) and (6); Appendix E to 10 CFR 50; Regulatory Guide 1.206, Section C.I.13.3.1

SRP Acceptance Criteria: 1, 2, 6, and 30

10 CFR 50.47(b)(5) and Part 50, Appendix E, Section IV.D.3 require licensees to establish the capability to promptly alert and notify the public of an emergency at a nuclear power plant within the plume exposure pathway (10-mile Emergency Planning Zone), while meeting certain design objectives. The Levy COL application includes a discussion in its emergency plan that identifies the Alert Notification System (ANS) as the "primary" means for accomplishing this task, and provides a basic discussion of that capability. The term "primary" implies that there is a secondary method for alerting and notifying the public of an emergency. **Clarify the use of the term "primary" and describe any secondary capability in the emergency plan, or provide reference to where this information is contained, to promptly alert and notify the public of an emergency should a major portion of the facility's primary ANS become unavailable.**

PGN RAI ID #: L-0751

PGN Response to NRC RAI:

Levy COLA Part 5, Emergency Plan Sections E.5 and J.10.c state the primary method of warning the public is by use of the Alert and Notification System (ANS). Section E.5 continues to state the ANS consists of a system of sirens. The alternate method of public notification is introduced in Appendix 7, Public Alert and Notification System. Appendix 7 Sections 2.1 and 2.2 refer to mobile sirens being the alternate method of notifying the public when offsite locations beyond 5 miles from the site are not suitable for fixed siren emplacement. A future revision to the Levy COLA Part 5 will include reference to the alternate method in Section E.5 and J.10.c.

Section J.10.c states warnings to the public are the responsibility of state and local officials. Guidance for notification to the public for the State of Florida and EPZ counties for LNP is contained in "The State of Florida Radiological Emergency Management Plan Annex A, Appendix VI, Levy Nuclear Plant Site Plan Section VI, Notification to the Public." The Alert and Notification System related to sirens or other alternate methods discussed for LNP is the same public notification protocol used for the Crystal River Nuclear Power Plant located approximately 9 miles from LNP.

Associated LNP COL Application Revisions:

The following changes will be made in a future revision to Part 5, Emergency Plan of the LNP COLA:

1. Revise Section E.5 from:

The primary method of alerting the public is by sounding the Alert and Notification System. The Alert and Notification System consists of a system of sirens that alert the public in the 10-mile EPZ of the recommendation to initiate protective actions. Upon hearing the warning sirens, the public is instructed to tune their radios or televisions to emergency channels for further instructions. Local and state actions are then instituted in accordance with the State Plan to ensure the implementation of appropriate protective measures.

To Read:

The primary method of alerting the public is by sounding the Alert and Notification System. The Alert and Notification System consists of a system of sirens that alert the public in the 10-mile EPZ of the recommendation to initiate protective actions. An alternate means of alerting the population may be used for areas that are not suitable for fixed siren emplacement. An alternate means includes the use of mobile sirens in areas beyond 5 miles from the site to alert the public in sparsely populated areas. Upon hearing the warning sirens, the public is instructed to tune their radios or televisions to emergency channels for further instructions. Local and state actions are then instituted in accordance with the State Plan to ensure the implementation of appropriate protective measures.

2. Revise Section J.10.c from:

Warnings to the public within the 10-mile EPZ are the responsibility of state and local officials. The primary method of warning the public is by the use of the Alert and Notification System.

To read:

Warnings to the public within the 10-mile EPZ are the responsibility of state and local officials. The primary method of warning the public is by the use of the Alert and Notification System. The Alert and Notification System consists of a system of sirens that alert the public in the 10-mile EPZ of the recommendation to initiate protective actions. An alternate means of alerting the population may be used for areas that are not suitable for fixed siren emplacement. An alternate means includes the use of mobile sirens in areas beyond 5 miles from the site to alert the public in sparsely populated areas.

Attachments/Enclosures:

None.

NRC Letter No.: LNP-RAI-LTR-083

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI #: 13.03-39

Text of NRC RAI:

Subject: Emergency Operations Facility

Regulatory Basis: 10 CFR 50.47; Appendix E to 10 CFR 50; Regulatory Guide 1.206, Section C.I.13.3.1

Acceptance Criteria: 1, 2, and 30

The following information was provided in the response to ITAAC RAI 14.3.10-1(J), and Site RAIs 13.03-21(A) and 13.03-18(3)(A)(D):

- The EOF is located outside the 10-mile EPZ, but within 20 miles of the LNP and CR3 Technical Support Centers;
- The equipment in the EOF will be available in adequate number with connection capability to facilitate unimpeded communication with offsite agencies, onsite emergency response facilities and the Emergency News Center;
- The EOF will have the capability to acquire, display and evaluate radiological, meteorological, and plant system data pertinent to offsite protective measures for both LNP and CR3 without decreasing effectiveness;
- In the event of a simultaneous emergency at both Levy and CR3, personnel assigned to each site's EOF emergency response organization will respond to the EOF. During the facility activation process, Progress Energy will assign one EOF Facility lead (EOF Director) for command and control of the EOF response. The facility lead will be a single point of contact to interface with State, county, and federal agencies for protective action decision-making and other EOF-related responsibilities during the simultaneous emergency. The EOF staff for each site will provide support as assigned.
- Detailed information describing response to a simultaneous emergency event at both Levy and CR3 will be located in EPIPs;

Include this information in the LNP emergency plan, or justify why this information is not required.

PGN RAI ID #: L-0752

PGN Response to NRC RAI:

The information in the five (5) bullets listed above will be added to the applicable section(s) of the LNP Emergency Plan in a future revision to the Levy COLA Part 5 Emergency Plan.

Associated LNP COL Application Revisions:

The following changes will be made in a future revision to Part 5, Emergency Plan of the LNP COLA:

1. Revise Section H.2.1.a.1 "Characteristics" from:
 1. Located at the Crystal River Training Center / EOF on West Venable Street in Crystal River, Florida. The facility is a shared EOF with the Crystal River Nuclear Plant (CR3).

To Read:

1. Located outside the 10-mile EPZ, but within 20 miles of the LNP and CR3 Technical Support Centers at the Crystal River Training Center / EOF on West Venable Street in Crystal River, Florida. The facility is a shared EOF with the Crystal River Nuclear Plant (CR3).
2. Revise Section H.2.1.c.1 "Emergency Equipment and Supplies" to add:
 1. Equipment will be available in adequate number with connection capability to facilitate unimpeded communication with offsite agencies, onsite emergency response facilities and the Emergency News Center.

And renumber remaining section of H.2.1.c.

3. Revise Section H.2.1.b.1 "Functions" to add:
 1. Capable to acquire, display and evaluate radiological, meteorological, and plant system data pertinent to offsite protective measures for both LNP and CR3 without decreasing effectiveness.

And renumber remaining section of H.2.1.b.

4. Revise Section A "Assignment of Responsibility (Organizational Control)" from:

In the event of an emergency situation at the LNP, the activation of the emergency response organization will be required. Additionally, various state, local, federal, and private sector organizations may be required to contribute to the emergency response. This section describes the responsibilities of these organizations.

To Read:

In the event of an emergency situation at the LNP, the activation of the emergency response organization will be required. Additionally, various state, local, federal, and private sector organizations may be required to contribute to the emergency response. This section describes the responsibilities of these organizations.

In the event of a simultaneous emergency at both Levy and CR3 personnel assigned to each site's EOF emergency response organization will respond to the EOF. During the facility activation process, Progress Energy will assign one EOF Facility lead (EOF Director) for command and control of the EOF response. The facility lead will be a single point of contact to interface with State, county, and federal agencies for protective action decision-making and other EOF-related responsibilities during the simultaneous emergency. The EOF staff for each site will provide support as assigned.

Detailed information describing response to a simultaneous emergency event at both Levy and CR3 will be located in Emergency Plan Implementing Procedures.

5. Revise Section B.5.2 "Off-site Emergency Response Organization" from:

The Off-site ERO is activated during an emergency classified as an Alert or higher. It functions under the direction of the EOF Director, and is responsible for off-site emergency response activities. These activities include providing information to, and interface with, off-site authorities, monitoring off-site results of the event, protecting plant personnel outside the Protected Area(s), supporting the on-site organization and coordinating the flow of information to the Public Information ERO.

To Read:

The Off-site ERO is activated during an emergency classified as an Alert or higher. It functions under the direction of the EOF Director, and is responsible for off-site emergency response activities. These activities include providing information to, and interface with, off-site authorities, monitoring off-site results of the event, protecting plant personnel outside the Protected Area(s), supporting the on-site organization and coordinating the flow of information to the Public Information ERO.

In the event of a simultaneous emergency at both Levy and CR3 personnel assigned to each site's EOF emergency response organization will respond to the EOF. During the facility activation process, Progress Energy will assign one EOF Facility lead (EOF Director) for command and control of the EOF response. The facility lead will be a single point of contact to interface with State, county, and federal agencies for protective action decision-making and other EOF-related responsibilities during the simultaneous emergency. The EOF staff for each site will provide support as assigned.

Detailed information describing response to a simultaneous emergency event at both Levy and CR3 will be located in Emergency Plan Implementing Procedures.

Attachments/Enclosures:

None.

NRC Letter No.: LNP-RAI-LTR-083

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI #: 13.03-40

Text of NRC RAI:

Subject: Dose Assessment

Regulatory Basis: 10 CFR 50.47(b)(9); Appendix E to 10 CFR 50; NUREG-0654/FEMA-REP-1, Evaluation Criterion I.1, I.2, I.3, I.4, I.6, and I.10; Supplement 1 to NUREG-0737

Acceptance Criteria: 1, 2, and 30

The response to Supplemental RAI 13.03-35 states that an EPIP will be used to assess the dose to personnel down wind of an accidental release. In addition, the response states that this EPIP will provide Operations staff with a rapid method of determining the magnitude of a radioactive release from LNP during an accident condition.

1. **Clarify in the LNP Emergency Plan that the methodology used in the EPIP for Dose Assessment addresses meteorological regimes (e.g., seabreeze) and the topographical effects to the LNP site such that dose projections will be representative of the site.**
2. Section O.4, "Emergency Response Training and Qualification," only identifies Radiological Control Personnel as receiving dose assessment training. **Provide clarification in the LNP Emergency Plan to address dose assessment training for Operations staff in consideration of their on-shift responsibility to perform dose-assessment required by the plan, or justify why this information is not required.**

PGN RAI ID #: L-0753

PGN Response to NRC RAI:

1. Section I.4.2, Off-Site Dose Assessment will be changed in a future revision of the LNP COLA Part 5 Emergency Plan to clarify dose assessment addresses meteorological regimes (e.g., seabreeze) and the topographical effects to the LNP site such that dose projections will be representative of the site.
2. Section O.4, Emergency Response Training and Qualification will be changed in a future revision of the LNP COLA Part 5 Emergency Plan to clarify the Control Room Staff (Operations) including the shift technical advisor will receive offsite dose assessment training.

Associated LNP COL Application Revisions:

The following changes will be made in a future revision to Part 5, Emergency Plan of the LNP COLA:

1. Revise Section I.4.2, Off-Site Dose Assessment (see response to LNP-RAI-LTR-074 NRC RAI 13.03-35 per NPD-NRC-2009-247 dated December 18, 2009) paragraph 1 from:

In order to provide for protection of LNP personnel and the public, the radiological impact in terms of actual or projected doses to individuals and population groups must be determined. Emergency workers and monitoring stations are provided with dose measurement instrumentation, but for some groups and, in particular the affected population in the plume exposure EPZ, dose calculations or projections may be required. An Emergency Plan Implementing Procedure (EPIP) will be used to assess the dose to personnel downwind of an accidental radioactive release. The EPIP will provide Operations Staff with a rapid method of determining the magnitude of a radioactive release from LNP during an accident condition. The EPIP will be performed manually. The manual method contains a series of tables, which are used along with meteorological and radiological data displayed in the Control Room to quickly generate off-site dose information. It is intended that this procedure be used in the initial phases of the emergency to determine appropriate protective actions to be recommended to off-site authorities.

To Read:

In order to provide for protection of LNP personnel and the public, the radiological impact in terms of actual or projected doses to individuals and population groups must be determined. Emergency workers and monitoring stations are provided with dose measurement instrumentation, but for some groups and, in particular the affected population in the plume exposure EPZ, dose calculations or projections may be required.

An Emergency Plan Implementing Procedure (EPIP) will be used to assess the dose to personnel downwind of an accidental radioactive release. The EPIP will account for specific criteria such as meteorological regimes (e.g., seabreeze) and other topographical effects so the dose projections will be representative of the LNP site. The EPIP will provide Operations Staff with a rapid method of determining the magnitude of a radioactive release from LNP during an accident condition. The EPIP will be performed manually. The manual method contains a series of tables, which are used along with meteorological and radiological data displayed in the Control Room to quickly generate off-site dose information. It is intended that this procedure be used in the initial phases of the emergency to determine appropriate protective actions to be recommended to off-site authorities.

2. Revise Section O.4, Emergency Response Training and Qualification to add the following text:
 - b. Control Room (Operations) Staff to include Shift Technical Advisor: Emergency condition assessment and classification, notification systems and procedures, organizational interfaces, LNP site evacuation, offsite dose assessment, offsite support, and recovery.

And renumber remaining section of O.4.

Attachments/Enclosures:

None.

NRC Letter No.: LNP-RAI-LTR-083

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI #: 13.03-41

Text of NRC RAI:

Subject: Onsite Emergency Organization

Regulatory Basis: 10 CFR 50.47(b)(2); 10 CFR 50, Appendix E.IV.A.2; Appendix E.IV.A.4; NUREG-0654/FEMA-REP-1, Evaluation Criterion B.5

Acceptance Criteria: 1, 2, and 30

1. Table B-1 in the LNP Emergency Plan identifies the Emergency Position of Dose Projection Team Leader as responsible for the Major Tasks of Off-Site Dose Assessment; however, this key position is not discussed in Section B.5, "Plant Emergency Response Staff," of the LNP Emergency plan. **Provide a discussion of the emergency support function and responsibility of the Dose Projection Team Leader in the LNP Emergency Plan.**
2. The response to Supplemental RAI 13.03-29(3)(a) stated that footnote "f" for the Mechanical Maintenance and Electrical/I&C Maintenance emergency positions identified in Table B-1 of the LNP Emergency Plan would be deleted in the next revision, however the revised Table B-1 was not provided as part of the applicant's response. **Provide the revised Table B-1, which reflects the deletion of the footnote "f" for the Mechanical Maintenance and Electrical/I&C Maintenance emergency positions.**

PGN RAI ID #: L-0754

PGN Response to NRC RAI:

1. The LNP COLA Part 5 Emergency Plan Table B-1, Minimum Staffing Requirements for Emergencies, lists the Dose Projection Team Leader as being the emergency position filling the major task of off-site dose assessment. The Dose Projection Team Leader is located in the EOF and reports to the Radiation Controls Manager as shown on Figure B-3, Off-Site Emergency Response Organization (EOF/ENC). Section B.5.2, Off-site Emergency Response Organization, of the LNP Emergency Plan will be updated in a future revision to include a discussion of the emergency support function and responsibility of the Dose Projection Team Leader.
2. A copy of Table B-1, Minimum Staffing Requirements for Emergencies is attached. The attachment reflects the deletion of footnote "f" from the Mechanical Maintenance and Electrical/I&C Maintenance emergency positions as stated in the response to Supplemental RAI 13.03-29(3)(a). In addition attached Table B-1 includes changes further described in Supplemental RAI response to 13.03-29(1) as described per letter NPD-NRC-2009-247 dated December 18, 2009.

Associated LNP COL Application Revisions:

The following changes will be made in a future revision to Part 5, Emergency Plan of the LNP COLA:

1. Revise Section B.5.2.c, Off-Site Emergency Response Organization from:

Radiation Controls Manager: The Radiation Controls Manager is located in the EOF and reports to the EOF Director; responsible for providing direction for dose assessment and environmental monitoring activities; and keeping the EOF staff informed of radiological conditions off-site.

To Read:

Dose Projection Team Leader: The Dose Projection Team Leader is located in the EOF and reports to the Radiation Controls Manager; responsible for coordinating off-site dose assessment activities; and generating actual and hypothetical off-site dose projections.

2. Renumber Radiation Controls Manager to Section B.5.2.b which is not currently being used.

Attachments/Enclosures:

Attachment 13.03-41: Table B-1, Minimum Staffing Requirements for Emergencies [2 pages]

NRC Letter No.: LNP-RAI-LTR-083

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI #: 13.03-42

Text of NRC RAI:

Subject: Procedures

Regulatory Basis: 10 CFR 50, Appendix E.V; NUREG-0654/FEMA-REP-1, Evaluation Criterion P.7

Acceptance Criteria: 1, 2, and 30

The staff is unable to make a correlation between the LNP Emergency Plan and some of the procedures identified in Appendix 5, "List of Emergency Plan Supporting Procedures." For example:

- EPIP titled "Activation and Operation," or "Recommendations"
- EPIP titled "Emergency Preparedness Training" references section "N – Exercises and Drills"
- No EPIP for Emergency Response Staffing (includes minimum and augmented staffing with roles and responsibilities)
- No EPIP for Security's response activities associated with activation of the ERO (includes ingress, egress, and control of onsite and offsite emergency response personnel)
- No EPIP for Radiological Exposure Control (includes the means for onsite radiation protection, determining doses received by emergency personnel, maintaining dose records during an emergency, decontaminating relocated onsite personnel (including waste disposal), and onsite contamination control measures)

Provide clarification and revise Appendix 5 or the LNP Emergency Plan accordingly.

PGN RAI ID #: L-0755

PGN Response to NRC RAI:

Bullet 1 response: The EPIP titled "Activation and Operation" goes with the previous line entry of "Technical Support Center." The EPIP will be titled "Activation and Operation of the Technical Support Center" in a future revision of the LNP COLA Part 5 Emergency Plan. Emergency Plan section "H" will also be added to the "Affected Sections of This Plan" for the EPIP.

The EPIP titled "Recommendations" goes with the previous line entry of "Protective Action." The EPIP will be titled "Protective Action Recommendations" in a future revision of the LNP COLA Part 5 Emergency Plan.

Bullet 2 response: The affected section of the LNP Emergency Plan for the EPIP titled Emergency Preparedness Training is Section O, Radiological Emergency Response Training. The "Affected Sections of This Plan" column in Appendix 5 will be revised to "O" in a future revision of the LNP COLA Part 5 Emergency Plan for the subject EPIP.

Bullet 3 response: The LNP Emergency Plan will not have a combined EPIP to provide guidance solely for emergency response staffing. The EOF, TSC, OSC and Emergency News Center will each have an individual activation and operation EPIP. Contained in the facility-specific EPIP are the minimum staff and augmented staff roles and responsibilities for personnel responding to the facility.

Bullet 4 response: The LNP Emergency Plan contains an EPIP for Security's response activities associated with activation of the ERO, including ingress, egress, and control of onsite and offsite emergency response personnel. The EPIP is titled "Duties of the LNP Nuclear Security Organization" and will be added to the list of Implementing Procedures on Appendix 5, List of Emergency Plan Supporting Procedures in a future revision of the LNP COLA Part 5 Emergency Plan.

Bullet 5 response: The LNP Emergency Plan contains an EPIP for Radiological Exposure Control, including the means for onsite radiation protection, determining dose received by emergency personnel, maintaining dose records during an emergency, decontaminating relocated onsite personnel (including waste disposal), and onsite contamination control measures. The EPIP is titled "Radiological Exposure Control" and will be added to the list of Implementing Procedures on Appendix 5, List of Emergency Plan Supporting Procedures in a future revision of the LNP COLA Part 5 Emergency Plan.

Associated LNP COL Application Revisions:

The following change will be made in a future revision to Part 5, Emergency Plan of the LNP COLA:

1. Revise Appendix 5, List of Emergency Plan Supporting Procedures from:

<u>Implementing Procedures</u>	<u>Affected Sections of This Plan</u>
Emergency Classification	Section D
Notifications/Communications	Section E
Protective Action	Section J
Recommendations	Section J
Dose Assessment	Section I
Off-site Radiological Monitoring	Section I
Core Damage	Section I
Evacuation and Accountability	Section J
Medical Response	Section L
Recovery and Reentry	Section M
Technical Support Center	Section B
Activation and Operation	Sections B, C, & H
Operational Support Center Activation and Operation	Sections B & H
Emergency Operations Facility Activation and Operation	Sections B & H
Emergency News Center Activation and Operation	Sections B & H
<u>Administrative Procedures</u>	
Maintaining Emergency Preparedness	Section P
Emergency Response Facilities and Equipment	Sections B, C, & H

Drills and Exercises	Section N
Emergency Preparedness Training	Section N
Public Information	Section G
Emergency Preparedness Telephone Directory	Section E

To Read:

<u>Implementing Procedures</u>	<u>Affected Sections of This Plan</u>
Emergency Classification	Section D
Notification and Communication	Section E & F
Protective Action Recommendations	Section J
Dose Assessment	Section I
Radiological Exposure Control	Section K
Off-site Radiological Monitoring	Section I
Core Damage	Section I
Evacuation and Accountability	Section J
Medical Response	Section L
Recovery and Reentry	Section M
Activation and Operation of the Technical Support Center	Sections B & H
Activation and Operation of the Operational Support Center	Sections B & H
Activation and Operation of the Emergency Operations Facility	Sections A, B & H
Activation and Operation of the Emergency News Center	Sections B & H
Activation and Operation of the Alternate Emergency Response Facility	Section H
Duties of the LNP Nuclear Security Organization	Sections B & J
<u>Administrative Procedures</u>	
Maintaining Emergency Preparedness	Section P
Emergency Response Facilities and Equipment	Sections B, C, & H
Drills and Exercises	Section N
Emergency Preparedness Training	Section O
Public Information	Section G
Emergency Preparedness Telephone Directory	Section E

Attachments/Enclosures:

None.

NRC Letter No.: LNP-RAI-LTR-083

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI #: 13.03-43

Text of NRC RAI:

Subject: Supporting Plans

Regulatory Basis: 10 CFR 50, Appendix E.V; NUREG-0654/FEMA-REP-1, Evaluation Criterion P.6

Acceptance Criteria: 1, 2, and 30

Section P.6, "Supporting Plans," of the LNP Emergency Plan provides a listing of various supporting plans (e.g., State of Florida Radiological Emergency Management Plan and State of Florida Comprehensive Emergency Management Plan). However, Section P.6 does not list the Radiological Emergency Management Plans for Levy, Citrus, and Marion counties. **List the Radiological Emergency Management Plans for Levy, Citrus, and Marion counties in Section P.6 of the LNP Emergency Plan, or justify why this information is not required.**

PGN RAI ID #: L-0756

PGN Response to NRC RAI:

Section P.6, Supporting Plans, will be changed in a future revision of the LNP COLA Part 5 Emergency Plan to list the Radiological Emergency Management Plans for Levy, Citrus, and Marion counties.

Associated LNP COL Application Revisions:

The following changes will be made in a future revision to Part 5, Emergency Plan of the LNP COLA:

1. Revise Section P.6, Supporting Plans from:

Other plans that support this Plan are:

- a. The State of Florida Radiological Emergency Management Plan (Annex A to the State of Florida Comprehensive Emergency Management Plan) (Reference O).
- b. Appendix VI of the State Plan (Levy Nuclear Plant Site Plan) (Reference O).
- c. U.S. Nuclear Regulatory Commission, NUREG-0728, NRC Incident Response Plan (Reference Y).
- d. National Response Framework (Reference J).
- e. NRC Region II Incident Response Plan.
- f. Institute of Nuclear Power Operations (INPO) Emergency Response Plan.

To Read:

Other plans that support this Plan are:

- a. The State of Florida Radiological Emergency Management Plan (Annex A to the State of Florida Comprehensive Emergency Management Plan) (Reference O).
 - b. Appendix VI of the State Plan (Levy Nuclear Plant Site Plan) (Reference O).
 - c. Citrus County Sheriff's Office Radiological Emergency Preparedness (Rep) Plan For Crystal River and Levy Nuclear Power Plants (Reference EE).
 - d. Levy County Emergency Management Radiological Emergency Preparedness Plan (Reference FF).
 - e. Marion County Emergency Management Radiological Emergency Preparedness (REP) Plan For the Levy Nuclear Power Plant (Reference GG).
 - f. U.S. Nuclear Regulatory Commission, NUREG-0728, NRC Incident Response Plan (Reference Y).
 - g. National Response Framework (Reference J).
 - h. NRC Region II Incident Response Plan.
 - i. Institute of Nuclear Power Operations (INPO) Emergency Response Plan.
2. Add the following to Appendix 2, References:
- EE. Citrus County Sheriff's Office Radiological Emergency Preparedness (Rep) Plan For Crystal River and Levy Nuclear Power Plants, Table of Contents dated JuneApril 2009.
 - FF. Levy County Emergency Management Radiological Emergency Preparedness Plan, June 2009.
 - GG. Marion County Emergency Management Radiological Emergency Preparedness (REP) Plan For the Levy Nuclear Power Plant, Revision 0, August 3, 2009.

Attachments/Enclosures:

None.

NRC Letter No.: LNP-RAI-LTR-083

NRC Letter Date: March 8, 2010

NRC Review of Final Safety Analysis Report

NRC RAI #: 13.03-44

Text of NRC RAI:

Subject: ITAAC

Regulatory Basis: 10 CFR 52.80(a)

SRP Acceptance Criteria: Requirement E; Acceptance Criterion 23

In response to Supplemental RAI 13.03-32(6), additional EP ITAAC were proposed in Table 3.8-1 of the LNP Emergency Plan consistent with the standard EP ITAAC identified in RG 1.206, Table C.II.1-B1. However, the following need to be addressed:

1. LNP EP ITAAC for Planning Standard 5.0, "Emergency Communications," Acceptance Criteria 5.2, states, in part, that the access port for ERDS is provided and successfully completes a transfer of data from the Operating Units to the NRC Operations Center. **Clarify the process for transferring information from the "Operating Units" to the NRCOC utilizing ERDS given that the Units will not be operating and EP ITAAC are expected to be complete prior to loading fuel. Revise the EP ITAAC acceptance criteria accordingly.**
2. Table B-1 in the LNP Emergency Plan identifies Radiological Control and Environmental Monitoring Team personnel as on-shift responders, or augmented responders with staffing times of 30 to 45 minutes and 60-75 minutes, respectively. LNP EP ITAAC for Planning Standard 8.0, "Accident Assessment," Acceptance Criteria 8.1.B.3, and Planning Standard 12.0, "Exercises and Drills," Acceptance Criteria 12.1.1.E.3.a, requires the applicant demonstrate the ability to activate these two teams within 75 minutes of an event declaration. **Discuss why the response time requirement in the LNP EP ITAAC table is inconsistent with Table B-1. Include in the discussion the concept of "activation" as it pertains to the teams being notified of an emergency, requested to report to their respective Emergency Response Facility, receive a briefing, and commence emergency activities.**
3. LNP EP ITAAC for Planning Standard 9.0, "Protective Response," and 12.0 Exercises and Drills," Acceptance Criteria 9.1 and 12.1.1.B.3 state the applicant will demonstrate the ability to warn and advise onsite individuals of an emergency. Section J.1, "On-site Notification," of the LNP Emergency Plan states that LNP has established methods to inform personnel and others (e.g., LNP personnel not having emergency assignments, visitors, contractors, others within the owner controlled area) within the LNP site boundary, in a timely manner (about 15 minutes) of an emergency condition requiring individual action. **Include in the EP ITAAC acceptance criteria the time required to warn and advise onsite individuals of an emergency consistent with the LNP Emergency Plan.**
4. LNP EP ITAAC for Planning Standard 12.0, "Exercises and Drills," Acceptance Criteria 12.1.1.E.6.b and c, states that KI was administered for activities where personnel dose to the thyroid was calculated, or estimated, to be greater than 50 Rem CDE, and follow-

up care for individuals exposed to greater than 25 Rem CDE was identified. **Provide the rationale for the 50 Rem and 25 Rem CDE thresholds for the issuance of KI.**

5. LNP EP ITAAC for Planning Standard 13.0, "Radiological Emergency Response Training," Acceptance Criteria 13.1 states that site-specific emergency response training has been provided for the LNP emergency response organization that may be called upon to provide assistance in the event of an emergency as documented on training records. However, there are no acceptance criteria to reflect that off-site response organizations (e.g., police, firefighters, off-site medical response personnel) have been provided emergency response training consistent with Section O.1.a, "Off-site Emergency Response Training," of the LNP Emergency Plan. **Provide EP ITAAC acceptance criteria to reflect that off-site response organizations have been provided the appropriate training consistent with Section O.1.a of the LNP Emergency Plan, or justify why this information is not required.**

PGN RAI ID #: L-0757

PGN Response to NRC RAI:

1. LNP EP ITAAC acceptance criteria 5.2 currently refers to "Operating Units" however the LNP Units will not be operating at time of ITAAC closure. EP ITAAC acceptance criteria 5.2 will be revised in a future revision to Part 10 of the LNP COLA to refer to the "plant computer system" versus "Operating units" as the source transferring ERDS data to the NRC Operations Center.
2. The standard criteria for EP ITAAC 12.1.1.E.3.a will be revised in a future revision to Part 10 of the LNP COLA to be consistent with the augmented staffing time in Table B-1 of the LNP Emergency Plan. Wording will be modified in EP ITAAC 12.1.1.E.3.a to state one environmental monitoring team is ready to be deployed within 60 minutes from the declaration of an Alert or higher emergency. The 60 minutes consists of 45 minutes to respond after notification per Table B-1 Environmental Monitoring Team personnel capability for additions. An additional 15 minutes is needed to brief the Team and physically deploy. The 15 minutes is consistent with the time needed to declare a facility operational per Section H.4, Activation and Staffing of Emergency Response Facilities of the LNP Emergency Plan.

The OSC, TSC and EOF, including Environmental Monitoring Team, activates at an Alert or higher classification. Therefore, the 60 minutes used for deployment in EP ITAAC 12.1.1.E.3.a is the most rapid such a team would be needed. Offsite monitoring is not needed for a Notice of Unusual Event.

EP ITAAC 12.1.1.E.3.b currently states a team deployment will occur within approximately 10 minutes of receipt of instructions to deploy. EP ITAAC 12.1.1.E.3.b will be deleted in a future revision to Part 10 of the LNP COLA due to the redundancy in "deployment" criteria established in EP ITAAC 12.1.1.E.3.a.

3. Section J.1 of the LNP Emergency Plan states LNP has established methods to inform personnel and others within the LNP site boundary, in a timely manner (about 15 minutes), of an emergency condition requiring individual action. EP ITAAC Acceptance Criteria 9.1 and 12.1.1.B.3 will be revised in a future revision to Part 10 of the LNP COLA to include the time requirement, "of about 15 minutes," to inform onsite individuals of an emergency consistent with the LNP Emergency Plan.

4. LNP EP ITAAC Acceptance Criteria 12.1.1.E.6 states, "Demonstrate the availability and use of potassium iodide (KI) for onsite emergency response personnel." LNP EP ITAAC Acceptance Criteria 12.1.1.E.6.b refers to a calculated or estimated value of >50 Rem CDE to the thyroid as being the limit where KI should be administered. The value of 50 Rem CDE was based on the occupational dose limit to an adult per 10 CFR 20.1201(a)(1)(ii). In a future revision to Part 10 of the LNP COLA, EP ITAAC 12.1.1.E.6.b will be changed from >50 Rem to >25 Rem. The change to >25 Rem is consistent with guidance provided in EPA-400, Manual of Protective Action Guides and Protective Actions for Nuclear Incidents section 2.3.2, Thyroid and Skin Protection.

LNP EP ITAAC Acceptance Criteria 12.1.1.E.6.c refers to follow-up care for individuals exposed to >25 Rem CDE. EP ITAAC 12.1.1.E.6.c does not support the Acceptance Criteria of 12.1.1.E.6 which is to demonstrate the availability and use of KI. EP ITAAC 12.1.1.E.6.c will be deleted in a future revision to Part 10 of the LNP COLA.

5. Section O.1.a of the LNP Emergency Plan states training will be provided to offsite response agencies that respond and support the LNP Emergency Plan. Offsite responders such as medical response personnel, local law enforcement and fire fighters are included in the response agencies discussed in Section O.1.a. EP ITAAC Acceptance Criteria 13.1 will be revised in a future revision to Part 10 of the LNP COLA to add offsite medical response, local law enforcement and firefighters requiring site-specific emergency response training for LNP.

Associated LNP COL Application Revisions:

The following changes will be made in a future revision to Part 10 of the LNP COLA:

1. Revise EP ITAAC Acceptance Criteria 5.2 from:

Communications are established between the Control Rooms, TSC and EOF to the NRC headquarters and regional office EOCs utilizing the ENS. The TSC and EOF demonstrate communications with the NRC Operations Center using HPN. The access port for ERDS [or its successor system] is provided and successfully completes a transfer of data from the Operating Units to the NRC Operations Center.

To Read:

Communications are established between the Control Rooms, TSC and EOF to the NRC headquarters and regional office EOCs utilizing the ENS. The TSC and EOF demonstrate communications with the NRC Operations Center using HPN. The access port for ERDS [or its successor system] is provided and successfully completes a transfer of data from the plant computer system to the NRC Operations Center.

2. Revise EP ITAAC Acceptance Criteria 12.1.1.E.3.a from:

Environmental monitoring team activation must be within 75 minutes of event declaration.

To Read:

One environmental monitoring team is ready to be deployed no later than 60 minutes (45 minutes to activate per Table B-1 of LNP Emergency Plan + 15 minutes for briefing) from the declaration of an Alert or higher emergency.

3. Delete EP ITAAC Acceptance Criteria 12.1.1.E.3.b.

4. Revise EP ITAAC Acceptance Criteria 9.1.B from:

Demonstrate the ability to warn and advise other personnel within the owner controlled area.

To Read:

Demonstrate the ability to warn and advise other personnel within the owner controlled area in a timely manner (about 15 minutes).

5. Revise EP ITAAC Acceptance Criteria 12.1.1.B.3 from:

Demonstrate the ability to warn or advise onsite individuals of emergency conditions, in accordance with emergency plan implementing procedures.

To Read:

Demonstrate the ability to warn or advise onsite individuals of emergency conditions in a timely manner (about 15 minutes), in accordance with emergency plan implementing procedures.

6. Revise EP ITAAC Acceptance Criteria 12.1.1.E.6.b from:

KI was administered for activities where personnel dose to the thyroid was calculated, or estimated, to be > 50 Rem CDE.

To Read:

KI was administered for activities where personnel dose to the thyroid was calculated, or estimated, to be > 25 Rem CDE.

7. Delete EP ITAAC Acceptance Criteria 12.1.1.E.6.c.

8. Revise EP ITAAC Acceptance Criteria 13.1 from:

Site-specific emergency response training has been provided for the LNP emergency response organization that may be called upon to provide assistance in the event of an emergency as documented on training records.

To Read:

Site-specific emergency response training has been provided for the:

- LNP emergency response organization, and
- Offsite medical, local law enforcement and firefighter personnel

that may be called upon to provide assistance in the event of an emergency as documented on training records.

Attachments/Enclosures:

None.

List of Attachments

1. NRC RAI # 13.03-41 (PGN RAI ID #L-0754):
Attachment 13.03-41 – Table B-1, Minimum Staffing Requirements for Emergencies
[2 pages]

**Levy Nuclear Plant Units 1 and 2
COL Application
Part 5, Emergency Plan**

**Table B-1 (Sheet 1 of 2)
Minimum Staffing Requirements for Emergencies**

Functional Area	Location	Major Tasks	Emergency Positions	Minimum Shift Size (Unit 1)	Minimum Shift Size (Units 1 & 2)	Capability for Additions	
						30-45 min	60-75 min
1. Plant Operations and Assessment of Operational Aspects	Control Room	Control Room Staff	Nuclear Shift Manager (NSM) ^(a)	1	1	–	–
			USCO	1	2	–	–
			Control Operators	2	4	–	–
			Non-Licensed Operators	2 ^(b)	4 ^(b)	–	–
2. Emergency Direction and Control	Control Room EOF TSC	–	EC – CR (NSM) ^(c)	1	1	–	–
			EOF Director ^(d)	–	–	–	1
			EC – TSC ^(d)	–	–	–	1
3. Notification and Communication	CR/TSC/EOF	Emergency Communicator	Plant Personnel	1	2	1	2
4. Radiological Assessment	EOF	Off-site Dose Assessment	Dose Projection Team Leader	–	–	1	–
	EOF	Off-site Surveys	Environmental Monitoring Team Personnel	–	–	2	2
	OSC	On-site Surveys	Radiological Control Team Personnel	–	–	1	1
	OSC	In-plant Surveys	Radiological Control Team Personnel	1	2	1	1
	OSC	Chemistry	Chemistry Team Personnel	1	2	–	1

(Continued on next page)

NOTES:

- a) After activation of the EOF and TSC.
- b) One of the two non-licensed operators may be assigned to the Fire Brigade.
- c) On shift responsibility prior to activation of the EOF and TSC.
- d) Overall direction of facility response is assumed by the EOF Director when all facilities are activated. The direction of minute-to-minute facility operations remains with the EC – TSC.

**Levy Nuclear Plant Units 1 and 2
COL Application
Part 5, Emergency Plan**

**Table B-1 (Sheet 2 of 2)
Minimum Staffing Requirements for Emergencies**

Functional Area	Location	Major Tasks	Emergency Positions	Minimum Shift Size (Unit 1)	Minimum Shift Size (Units 1 & 2)	Capability for Additions	
						30-45 min	60-75 min
5. Plant Engineering, Repair and Corrective Actions	CR	Technical Support	Shift Technical Advisor ^(e)	1	1	–	–
	TSC		Core Performance Engineering	–	–	1	–
	TSC		Mechanical Engineering	–	–	–	1
	TSC	Repair and Corrective Actions	Electrical Engineering	–	–	–	1
	OSC		Mechanical Maintenance	1	1	–	2
OSC		Electrical/I&C Maintenance	1	1	2	1	
6. In-plant Protective Actions	OSC	Radiation Protection	Radiological Control Team Personnel	2 ^(f)	1	2	2
7. Fire Fighting	CR/OSC	–	–	5 ^(g)		Local Support	
8. First Aid and Rescue Operations	CR/OSC	–	Plant Personnel	2 ^(f)		–	–
9. Site Access Control	Various Security Posts	Security and Accountability	Security Team Personnel	(h)	(h)	(h)	(h)
LNP TOTAL (Less Security):				15	22	11	16

NOTES:

- e) One Shift Technical Advisor (STA) is assigned per shift during plant operation. A shift manager or another SRO on shift, who meets the qualifications for the combined Senior Reactor Operator/Shift Technical Advisor (SRO/STA) position, as specified for option 1 of Generic Letter 86-04, the commission's policy statement on engineering expertise on shift, may also serve as the STA. If this option is used for a shift, then the separate STA position may be eliminated for that shift. (Reference LNP FSAR 13.1.2.1.3.8 and FSAR Table 13.1-202)
- f) May be provided by shift personnel assigned other functions.
- g) Fire Brigade per FSAR.
- h) Per Security Plan.