

PMVictoriaESPPEm Resource

From: Jessie, Janelle
Sent: Monday, March 14, 2011 1:32 PM
To: david.distel@exeloncorp.com
Cc: Hale, Jerry; VictoriaESP Resource
Subject: Courtesy Copy of VCS ESP RAI Ltr#5
Attachments: VCS ESP RAI Ltr #5.pdf

Good Afternoon David,

Attached is a courtesy copy of RAI Letter# 5 which was issued today, March 14, 2011.

This letter covers the RAIs that were discussed during the clarification call held last week.

Thanks

Janelle

Hearing Identifier: Victoria_ESP_Public
Email Number: 298

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Created By: Janelle.Jessie@nrc.gov

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March 14, 2011

Ms. Marilyn C. Kray
Vice President
New Plant Development
Exelon Generation
200 Exelon Way
Kennett Square, PA 19348

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 05
(SRP SECTIONS: 2.2.3 – EVALUATION OF POTENTIAL HAZARDS, 13.03-
EMERGENCY PLANNING AND 14.3.10-EMERGENCY PLANNING-
INSPECTIONS, TESTS, ANALYSES AND ACCEPTANCE CRITERIA)
RELATED TO THE VICTORIA COUNTY STATION EARLY SITE PERMIT
APPLICATION

Dear Ms. Kray:

By letter dated March 25, 2010, Exelon Nuclear Texas Holdings, LLC (Exelon) submitted an early site permit application for Victoria County Station pursuant to 10 CFR Part 52. The Nuclear Regulatory Commission (NRC) staff is performing a detailed review of this application.

The staff has identified that additional information is needed to continue portions of the review and the request for additional information (RAI) is contained in the enclosure to this letter. To support the review schedule, Exelon is requested to respond within 30 days of the date of this letter. If the RAI response involves changes to application documentation, Exelon is requested to include the associated revised documentation with the response.

Should you have questions, please contact Janelle Jessie at (301) 415-6775 or Janelle.Jessie@nrc.gov.

Sincerely,

/RA/

Janelle B. Jessie, Project Manager
BWR Projects Branch
Division of New Reactor Licensing
Office of New Reactors

Docket No. 52-042

Enclosure: Request for Additional Information

March 14, 2011

Ms. Marilyn C. Kray
Vice President
New Plant Development
Exelon Generation
200 Exelon Way
Kennett Square, PA 19348

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 05 (SRP
SECTIONS: 2.2.3 – EVALUATION OF POTENTIAL HAZARDS, 13.03-
EMERGENCY PLANNING AND 14.3.10-EMERGENCY PLANNING-
INSPECTIONS, TESTS, ANALYSES AND ACCEPTANCE CRITERIA)
RELATED TO THE VICTORIA COUNTY STATION EARLY SITE PERMIT
APPLICATION

Dear Ms. Kray:

By letter dated March 25, 2010, Exelon Nuclear Texas Holdings, LLC (Exelon) submitted an early site permit application for Victoria County Station pursuant to 10 CFR Part 52. The Nuclear Regulatory Commission (NRC) staff is performing a detailed review of this application.

The staff has identified that additional information is needed to continue portions of the review and the request for additional information (RAI) is contained in the enclosure to this letter. To support the review schedule, Exelon is requested to respond within 30 days of the date of this letter. If the RAI response involves changes to application documentation, Exelon is requested to include the associated revised documentation with the response.

Should you have questions, please contact Janelle Jessie at (301) 415-6775 or Janelle.Jessie@nrc.gov.

Sincerely,

/RA/

Janelle B. Jessie, Project Manager
BWR Projects Branch
Division of New Reactor Licensing
Office of New Reactors

Docket No. 52-042

Enclosure: Request for Additional Information

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E-RAI Tracking No: 5381, 5470, 5472

ADAMS Accession No.: ML110730100

OFFICE	BC: NRO/RSAC	BC: NSIR/DPR	PM:DNRL:BWR	TL:DNRL:BWR
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DATE	1/12/2011	2/7/2011	2/9/2011	2/23/2011

*Approval captured electronically in the electronic RAI system.

OFFICIAL RECORD COPY

Request for Additional Information No. 5381
Victoria County Station ESP
Exelon Texas
Docket No. 52-042
SRP Section: 02.02.03 - Evaluation of Potential Accidents
Application Section: 2.2.3

02.02.03-1

VCS SSAR Section 2.2.3.1.2.3, "Highways" states that, due to propane's low density, highway shipments of propane are limited to 36,800 pounds instead of the standard quantity listed in RG 1.91 of 50,000 pounds. Tanker trucks used for highway shipments of propane generally hold 10,400 gallons or 14,400 gallons. After allowing for a 20% void in the 10,400 gallon tank, it would hold approximately 36,800 pounds. A 14,400 gallon tanker would hold more than 36,800 pounds. Explain why 14,400 gallon tankers were not considered in this analysis.

Request for Additional Information No. 5470
Victoria County Station ESP
Exelon Texas
Docket No. 52-042

SRP Section: 14.03.10 - Emergency Planning - Inspections, Tests, Analyses, and Acceptance Criteria
Application Section: Part 4 - ITAAC

14.03.10-1

SITE-18: ITAAC

Basis: 10 CFR 52.80(a)

SRP Acceptance Criteria: Requirement E; Acceptance Criterion 23

ITAAC-1: In Section 13.3 of the ESP application, "Emergency Planning," Table 13.3-1, "ITAAC for Emergency Planning," the acceptance criteria are prefaced with the phrase "A report exists that ..." ITAAC Acceptance Criteria must be specific and objective in order to clearly identify specific requirements and compliance. NRC Regulatory Issue Summary (RIS) 2008-05, "Lessons Learned to Improve Inspections, Tests, Analyses, and Acceptance Criteria Submittal," dated February 27, 2008, provides the following guidance:

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

The use of the phrase "a report exists that" in the acceptance criteria does not clearly describe how verification is actually conducted to confirm compliance. An area that might be appropriate for using a report to confirm that various ITAAC have been met is in Planning Standard 8.0, "Exercises and Drills," for which an Exercise Report could serve to verify that various exercise-related ITAAC (e.g., exercise objectives) have been met.

Consistent with RIS 2008-05, discuss the type and scope of the reports cited in ITAAC Table 13.3-1, including how the report will serve to provide accurate and reliable confirmation that compliance with acceptance criteria is evident, or consider removing the words "a report exists that" from the Table.

14.03.10-2

SITE-18: ITAAC

Basis: 10 CFR 52.80(a)

SRP Acceptance Criteria: Requirement E; Acceptance Criterion 23

ITAAC-2: Table C.II.1-B1, "Emergency Planning – Generic Inspection, Test, Analysis, and Acceptance Criteria (EP-ITAAC)," in Appendix C.II.1-B, "Development Guidance for Emergency Planning ITAAC," to RG 1.206 contains the generic EP-ITAAC table. The table includes 16 Planning Standards and the accompanying EP Program Elements, Inspection, Tests, Analysis, and Acceptance Criteria. The VCS ESP application EP-ITAAC Table 13.3-1 does not address eight of the generic ITAAC Planning Standards. The following generic ITAAC Planning Standards are not addressed:

1. Assignment of Responsibility-Organizational Control – 10 CFR 50.47(b)(1)
2. Onsite Emergency Organization – 10 CFR 50.47(b)(2)
3. Emergency Response Support and Resources – 10 CFR 50.47(b)(3)
4. Radiological Exposure Control – 10 CFR 50.47(b)(11)
5. Medical and Public Health Support – 10 CFR 50.47(b)(12)
6. Recovery and Reentry Planning and Post-Accident Operations – 10 CFR 50.47(b)(13)
7. Radiological Emergency Response Training – 10 CFR 50.47(b)(15)
8. Responsibility for the Planning Effort: Development, Periodic Review, and Distribution of Emergency Plans – 10 CFR 50.47(b)(16)

Discuss why ITAAC were not developed for the above Planning Standards, or propose appropriate ITAAC.

14.03.10-3

SITE-18: ITAAC

Basis: 10 CFR 52.80(a)

SRP Acceptance Criteria: Requirement E; Acceptance Criterion 23

ITAAC-3: In Table 13.3-1, "ITAAC for Emergency Planning," in Section 13 of the ESP application, Acceptance Criteria 2.1.1 does not include language regarding notification of State and Local agencies within 15 minutes. **Revise Acceptance Criteria 2.1.1 to be consistent with Table C.II.1-B1 of RG 1.206, Acceptance Criteria 5.1, or propose an acceptable alternative.**

14.03.10-4

SITE-18: ITAAC

Basis: 10 CFR 52.80(a)

SRP Acceptance Criteria: Requirement E; Acceptance Criterion 23

ITAAC-4: In Table 13.3-1, "ITAAC for Emergency Planning," in Section 13 of the ESP application, Acceptance Criteria 2.2 does not provide the specific acceptance criteria for determination of successful test completion of mobilizing the VCS emergency response organization. **Revise Table 13.3-1 Acceptance Criteria 2.2 to include the specific acceptance criteria, or explain why it is not required.**

14.03.10-5

SITE-18: ITAAC

Basis: 10 CFR 52.80(a)

SRP Acceptance Criteria: Requirement E; Acceptance Criterion 23

ITAAC-5: In Table 13.3-1, "ITAAC for Emergency Planning," in Section 13 of the ESP application, Acceptance Criteria for Planning Standard 5.0, "Emergency Facilities and Equipment," do not include a criteria detailing the capabilities of the TSC – specifically whether it has the means to receive, store, process, and display plant and environmental information, and to

initiate emergency measures and conduct emergency assessment. **Revise Table 13.3-1 Acceptance Criteria for Planning Standard 5.0 to include the specific acceptance criteria, or explain why it is not required.**

14.03.10-6

SITE-18: ITAAC

Basis: 10 CFR 52.80(a)

SRP Acceptance Criteria: Requirement E; Acceptance Criterion 23

ITAAC-6: In Table 13.3-1, "ITAAC for Emergency Planning," in Section 13 of the ESP application, Acceptance Criteria 5.1.6 does not indicate whether the OSC is in a location separate from the TSC. **Revise Table 13.3-1 Acceptance Criteria 5.1.6 to include the specific location, or explain why it is not required.**

14.03.10-7

SITE-18: ITAAC

Basis: 10 CFR 52.80(a)

SRP Acceptance Criteria: Requirement E; Acceptance Criterion 23

ITAAC-7: In Table 13.3-1, "ITAAC for Emergency Planning," in Section 13 of the ESP application, Acceptance Criteria for Planning Standard 5.0, "Emergency Facilities and Equipment," do not include a criteria concerning EOF habitability. **Revise Table 13.3-1 Acceptance Criteria for Planning Standard 5.0 to include the specific acceptance criteria, or explain why it is not required.**

14.03.10-8

SITE-18: ITAAC

Basis: 10 CFR 52.80(a)

SRP Acceptance Criteria: Requirement E; Acceptance Criterion 23

ITAAC-8: In Table 13.3-1, "ITAAC for Emergency Planning," in Section 13 of the ESP application, Acceptance Criteria 6.4 describes specified meteorological data being available to the control room, TSC, and EOF. RG 1.206, Table C.II.1-B corresponding Acceptance Criteria 9.4 describes the need to demonstrate the ability to communicate meteorological data to the control room, TSC, EOF, offsite NRC center and to the state. **Revise Acceptance Criteria 6.4 to be consistent with Table C.II.1-B Acceptance Criteria 9.4, or propose an acceptable alternative.**

14.03.10-9

SITE-18: ITAAC

Basis: 10 CFR 52.80(a)

SRP Acceptance Criteria: Requirement E; Acceptance Criterion 23

ITAAC-9: In Table 13.3-1, "ITAAC for Emergency Planning," in Section 13 of the ESP application, Acceptance Criteria 6.7 describes relating contamination levels and airborne radioactivity levels to dose rates and gross radioactivity measurements. RG 1.206, Table C.II.1-B, corresponding Acceptance Criteria 9.9 describes the need to have the capability to compare these doses and levels with the EPA protective action guides (PAGs). **Revise Acceptance Criteria 6.7 to be consistent with Table C.II.1-B Acceptance Criteria 9.9, or propose an acceptable alternative.**

14.03.10-10

SITE-18: ITAAC

Basis: 10 CFR 52.80(a)

SRP Acceptance Criteria: Requirement E; Acceptance Criterion 23

ITAAC-10: In Table 13.3-1, "ITAAC for Emergency Planning," in Section 13 of the ESP application, Acceptance Criteria 8.1.2.2 addresses RG 1.206 Table C.II.1-B1 Acceptance Criteria 14.1.2, however, it does not include the word "successfully", as it relates to emergency responder performance. **Revise the acceptance criteria to include the word "successfully" or explain why it is not required.**

14.03.10-11

SITE-18: ITAAC

Basis: 10 CFR 52.80(a)

SRP Acceptance Criteria: Requirement E; Acceptance Criterion 23

ITAAC-11: In RG 1.206, "Emergency Planning-Generic Inspection, Test, Analyses, and Acceptance Criteria (EP-ITAAC)," Table C.II.1-B1 acceptance criteria 14.1.1 includes the bracketed statement that "The COL applicant will identify exercise objectives and associated acceptance criteria." Table 13.3-1, "ITAAC for Emergency Planning," in Section 13 of the ESP application Acceptance Criteria 8.1.1.2 states that exercise objectives, including specific acceptance criteria, addressed each of the eight listed emergency planning program elements. However, Table 13.3-1 does not identify what the exercise objectives and associated acceptance criteria are in order to clearly identify what the requirements are, and to provide the ability to determine whether they have been met. **Revise the acceptance criteria to include specific exercise objectives and associated acceptance criteria, or explain why it is not required.**

14.03.10-12

SITE-18: ITAAC

Basis: 10 CFR 52.80(a)

SRP Acceptance Criteria: Requirement E; Acceptance Criterion 23

ITAAC-12: In RG 1.206, "Emergency Planning-Generic Inspection, Test, Analyses, and Acceptance Criteria (EP-ITAAC)," C.II.1-B1 acceptance criteria 14.1.3 addresses offsite exercise objectives associated with the full participation exercise. However, Table 13.3-1, "ITAAC for Emergency Planning," in Section 13 of the ESP application does not include acceptance criteria to reflect the offsite exercise objectives associated with the full participation exercise. **Revise Table 13.3-1 to include the appropriate acceptance criteria, or explain why it is not required.**

Request for Additional Information No. 5472
Victoria County Station ESP
Exelon Texas
Docket No. 52-042
SRP Section: 13.03 - Emergency Planning
Application Section: Part 4 - Emergency Planning (ETE)

13.03-1

ETE-1: Introductory Materials Related to the ETE Report

Acceptance Criteria: Requirements A and H; Acceptance Criterion 11

Regulatory Basis: Regulatory Guide 1.206, Section I of Appendix 4 to NUREG-0654.

In the ETE Report, provide a general discussion of the underlying algorithms used in the model, including those related to intersection control or justify why this is not necessary.

13.03-2

ETE-2: Introductory Materials Related to the ETE Report

Acceptance Criteria: Requirements A and H; Acceptance Criterion 11

Regulatory Basis: Regulatory Guide 1.206, Section I of Appendix 4 to NUREG-0654.

The VISUM website referenced in Section 5.0, "Evacuation Time Estimate Methodology," includes information regarding how various procedures, such as Highway Assignment and Transit Assignment, provide the analyst multiple choices in the method of analyses. **Discuss in the ETE Report the User selections and optional procedures selected and used in the analysis, or justify why this is not necessary.**

13.03-3

ETE-3: Introductory Materials Related to the ETE Report

Acceptance Criteria: Requirements A and H; Acceptance Criterion 11

Regulatory Basis: Regulatory Guide 1.206, Section I of Appendix 4 to NUREG-0654.

The VISUM software description on the website referenced in Section 5.0 describes that weighting factors can be applied on zone connectors which provide better levels of calibration for side streets and intersection volumes. **Discuss in the ETE Report any weighting factors applied to streets and roadways in the modeling process, or justify why this is not necessary.**

13.03-4

ETE-4: Demand Estimation

Acceptance Criteria: Requirements A and H; Acceptance Criterion 11

Regulatory Basis: Section II of Appendix 4 to NUREG-0654.

Section 13.3.1.2, "Area Population," of the Victoria ESP SSAR, provides an estimate of 6,995 people for the permanent and transient population within 10 miles of the plant site. Section 3.1.2, "Permanent

Resident Population,” and Section 3.2, “Transient Population,” provide population values for the year 2010, of 6,435 persons for the permanent population, and 3,147 persons for the transient population for a total population of 9,582. **Explain which estimate is correct, and revise the ETE Report as needed.**

13.03-5

ETE-5: Demand Estimation

Acceptance Criteria: Requirements A and H; Acceptance Criterion 11

Regulatory Basis: Section II of Appendix 4 to NUREG-0654.

Section 3.1.2, “Permanent Resident Population,” explains that the telephone survey identified no households without automobiles and states that this indicates the vast majority of households own at least one vehicle. However, only 125 surveys were completed.

- A. Identify in the ETE Report the number of residents assumed to be non car-owning and in need of transportation to evacuate.**
- B. Discuss in the ETE Report the resources and mobilization times to support evacuation of the non car-owning population.**
- C. Identify in the ETE Report the number of non-ambulatory residents assumed to need assistance from outside the home due to a special need in order to evacuate.**

13.03-6

ETE-6: Demand Estimation

Acceptance Criteria: Requirements A and H; Acceptance Criterion 11

Regulatory Basis: Section II of Appendix 4 to NUREG-0654.

Section 3.2, “Transient Populations,” states that employment data was taken from 2008 estimates from Synergos Technologies. **Discuss the process used to estimate employment data for the EPZ, or justify why this is not necessary.**

13.03-7

ETE-7: Demand Estimation

Acceptance Criteria: Requirements A and H; Acceptance Criterion 11

Regulatory Basis: Section II of Appendix 4 to NUREG-0654.

Section 3.4, “Vehicle Occupancy Rates,” explains that an occupancy rate of 30 students per bus was used for the Bloomington Elementary School which results in the need for 14 buses to evacuate 395 students. **In the ETE Report, discuss whether 14 buses are available to support the evacuation of the school.**

13.03-8

ETE-8: Traffic Capacity

Acceptance Criteria: Requirements A and H; Acceptance Criterion 11

Regulatory Basis: Section III Appendix 4 to NUREG-0654.

US Highway 77 is identified as an evacuation route in Figure 12, "Evacuation Map and Routes," traversing through the entire EPZ in a northern to southern direction indicating a length of about 20 miles. US Highway 77 is identified in Appendix B, "Evacuation Network Links," as having a length of 6.3 miles. **In the ETE Report, discuss why the full length of US Highway 77 was not used in the analysis.**

13.03-9

ETE-9: Traffic Capacity

Acceptance Criteria: Requirements A and H; Acceptance Criterion 11

Regulatory Basis: Section III Appendix 4 to NUREG-0654.

In Figure 12, the location where US Highway 77 intersects with US Highway 59 indicates an intersection and a left turn required for travelers to access US Highway 77 to continue north. Aerial mapping shows this intersection to be non-signalized and a free flow under the East Frontage Road (State Road 91) with uninterrupted flow on US Highway 77 in the northerly direction. **Discuss in the ETE Report how the crossing of US Highway 77 and US Highway 59 was analyzed.**

13.03-10

ETE-10: Traffic Capacity

Acceptance Criteria: Requirements A and H; Acceptance Criterion 11

Regulatory Basis: Section III Appendix 4 to NUREG-0654.

Appendix B, "Evacuation Network Links," lists all of the roadways used as evacuation routes and identifies the number of lanes, length, and speed limit for each roadway segment. **In the ETE Report, provide an annotated map of the roadway nodal network that relates to Appendix B roadway segments.**

13.03-11

ETE-11: Traffic Capacity

Acceptance Criteria: Requirements A and H; Acceptance Criterion 11

Regulatory Basis: Section III Appendix 4 to NUREG-0654.

Section 5.2.2, "The Network Model," explains that roadway capacities used in the evacuation analysis were based on estimates from PTV/NAVTEQ and the values were verified using field collected road attributes and capacity calculation methodology. **In the ETE Report, provide the roadway capacities that correspond with the Appendix B roadway segments, or justify why this is not necessary.**

13.03-12

ETE-12: Analysis of Evacuation Times

Acceptance Criteria: Requirements A and H; Acceptance Criterion 11

Regulatory Basis: Section IV of Appendix 4 to NUREG-0654.

Section 2.1, "General Assumptions," states that for adverse weather conditions, speed limits were reduced by 40 percent and road capacities were reduced by 25 percent. **Discuss in the ETE Report the weather type (e.g., fog, rain, etc.) that was considered for the adverse condition.**

13.03-13

ETE-13: Analysis of Evacuation Times

Acceptance Criteria: Requirements A and H; Acceptance Criterion 11

Regulatory Basis: Section IV of Appendix 4 to NUREG-0654.

Section 5.1.1, "Trip Generation Events and Activities," states "Figure 14 shows the approach for estimating trip generation for different evacuation activities series." **Explain whether this should read "Table 12" rather than "Figure 14" and revise the ETE Report if necessary.**

13.03-14

ETE-14: Analysis of Evacuation Times

Acceptance Criteria: Requirements A and H; Acceptance Criterion 11

Regulatory Basis: Section IV of Appendix 4 to NUREG-0654.

Section 5.1.2, "Trip Generation Time Estimate," explains that the time distribution for notification presented in "Evaluating Protective Actions for Chemical Agent Emergencies," (ORNL-6615) was adopted for the ETE study and is presented in Figure 16, "Notification Times for Selected Alert and Notification Systems." In the ORNL-6615 study, Figure 3.4, "Probability of Receiving Warning by Warning System by Time Elapsed Since Warning Decision," shows similar, but not the same information, as Figure 16. For instance, Figure 16 provides data for the combination of EAS and siren systems; whereas, Figure 3.4 provides data for EAS or siren systems, but does not combine the data. **Explain how Figure 16 was derived from the ORNL-6615 study to present a distribution of warning time for the combined use of EAS and siren.**

13.03-15

ETE-15: Analysis of Evacuation Times

Acceptance Criteria: Requirements A and H; Acceptance Criterion 11

Regulatory Basis: Section IV of Appendix 4 to NUREG-0654.

In the ETE Report, discuss whether the ETEs presented in Table 14, "ETEs in Minutes for NUREG-0654 Evacuation Areas," include time to evacuate the non car-owning population.

13.03-16

ETE-16: Analysis of Evacuation Times

Acceptance Criteria: Requirements A and H; Acceptance Criterion 11

Regulatory Basis: Section IV of Appendix 4 to NUREG-0654.

Section 3.3, "Special Facility Populations," identifies Bloomington Elementary School with a population of 395 students. **Provide an ETE in the ETE Report for the Bloomington Elementary School, or justify why this is not necessary.**

13.03-17

ETE-17: Other Requirements

Acceptance Criteria: Requirements A and H; Acceptance Criterion 11

Regulatory Basis: Section V of Appendix 4 to NUREG-0654.

Section 7, "Confirmation of Evacuation," explains that the actual time associated with the confirmation process would depend on the process used, number of personnel and equipment available. **In the ETE Report, provide an estimate of the time required for confirmation of evacuation, or justify why this is not necessary.**

13.03-18

ETE-18: Other Requirements

Acceptance Criteria: Requirements A and H; Acceptance Criterion 11

Regulatory Basis: Section V of Appendix 4 to NUREG-0654.

Explain whether recommendations were discussed with local stakeholders.

13.03-19

ETE-19: Other Requirements

Acceptance Criteria: Requirements A and H; Acceptance Criterion 11

Regulatory Basis: Section V of Appendix 4 to NUREG-0654.

Section 8.2, "Traffic Control Points," states that the responsibility of supervising traffic controls will be shared between the state and emergency management and law enforcement agencies. **Discuss whether the ETE Report has been provided to principal state and local organizations for review and whether comments from these agencies have been received and addressed.**