

## PMVictoriaESPPEm Resource

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**From:** Jessie, Janelle  
**Sent:** Tuesday, March 01, 2011 2:50 PM  
**To:** david.distel@exeloncorp.com  
**Cc:** Hale, Jerry; VictoriaESP Resource  
**Subject:** Response Requested: Draft RAIs for Victoria County Station ESP Application  
**Attachments:** Draft RAIs 2.4, 13.3 and 15.1.pdf

Good Afternoon David,

Attached are draft RAIs in support of the safety review for the Victoria County Station ESP application for chapters 2, 13 and 15. There are three RAIs. RAI 5364 has 2 questions, RAI 5468 has 16 questions and RAI 5560 has 2 questions.

Please take a moment to review the questions to ensure that you understand what the staff is asking. Please be sure to let me know if a clarification call is needed by no later than Tuesday, March 8, 2011.

As a reminder, the purpose of a clarification call is to clarify what the staff is asking in the RAI questions. It is not a forum to debate a technical issue in the question or to share your intended response with the staff to determine if it meets the mark, as either of those types of calls require a public teleconference.

If a clarification call is not needed, please let me know this information as well.

Thanks

Janelle  
301-415-6775

**Hearing Identifier:** Victoria\_ESP\_Public  
**Email Number:** 306

**Mail Envelope Properties** (65FB43187ED87C46B3F00CB97D081E6026D1B06977)

**Subject:** Response Requested: Draft RAIs for Victoria County Station ESP Application  
**Sent Date:** 3/1/2011 2:50:15 PM  
**Received Date:** 3/1/2011 2:50:16 PM  
**From:** Jessie, Janelle

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Tracking Status: None

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Tracking Status: None

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Files	Size	Date & Time
MESSAGE	970	3/1/2011 2:50:16 PM
Draft RAIs 2.4, 13.3 and 15.1.pdf		114089

**Options**

**Priority:** Standard

**Return Notification:** No

**Reply Requested:** No

**Sensitivity:** Normal

**Expiration Date:**

**Recipients Received:**

Victoria County Station Draft RAIs

<b>Title</b>	Victoria County Station ESP - 02.04.04 - Potential Dam Failures - Question 19814
<b>RAI ID</b>	5364
<b>Acceptance Criteria</b>	100.20(c) and 52.79(a)(1)(iii)
<b>Question Type</b>	N/A
<b>Description</b>	<p>The staff has reviewed the application in accordance with the requirements of “Factors to be considered when evaluating sites” 10 CFR 100.20(c), and “Contents of application: technical information in the final safety analysis report” 10 CFR 52.79(a). The staff has reviewed FSAR Section 2.4.4, Potential Dam Failures and the dam breach outflow hydrographs for the postulated breach of the cooling basin. The outflow hydrographs are too short to determine if wave runup will impact the site and there is no discussion of the basis for selection of the breach location. Please describe the justification for breach locations and wave runup conclusions and provide a complete outflow recession curve.</p>

<b>Title</b>	Victoria County Station ESP - 02.04.04 - Potential Dam Failures - Question 19815
<b>RAI ID</b>	5364
<b>Acceptance Criteria</b>	100.20(c) and 52.79(a)(1)(iii)
<b>Question Type</b>	Application Specific
<b>Description</b>	<p>The staff has reviewed the application in accordance with the requirements of “Factors to be considered when evaluating sites” 10 CFR 100.20( c), and “Contents of application: technical information in the final safety analysis report” 10 CFR 52.79(a). The application does not provide detailed information discussing the cooling basin pool elevation selected for analysis and does not provide the background on the selection of the Manning’s n. Please provide additional information showing the selection of the cooling basin initial water surface elevation and the selection of Manning’s n in the vicinity of the breach, where applicable, considering that there are more conservative assumptions available.</p>

<b>Title</b>	Victoria County Station ESP - 13.03 - Emergency Planning - Question 20015
<b>RAI ID</b>	5468
<b>Acceptance Criteria</b>	[Basis: NUREG-0654/FEMA-REP-1, Evaluation Criterion A.1.a, 10 CFR 50, Appendix E.IV.A.8, A.1.b, A.1.c, A.3]
<b>Question Type</b>	Application Specific
<b>Description</b>	<p><b>SITE-1:</b> Assignment of Primary Responsibilities for Emergency Response</p> <p>[Basis: NUREG-0654/FEMA-REP-1, Evaluation Criterion A.1.a, 10 CFR 50, Appendix E.IV.A.8, A.1.b, A.1.c, A.3]  Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B; Acceptance Criteria 1 and 2.</p> <p>RAI A-1. The National Response Plan (NRP) was changed to the National Response Framework (NRF). Explain the continued reference to the NRP throughout the Emergency Plan, or update the Emergency Plan to refer to the NRF or justify why this is not necessary.</p> <p>RAI A-2. In the Emergency Plan, identify the State and/or local officials responsible for planning for, ordering, and controlling appropriate protective actions, or justify why this is not necessary.</p> <p>RAI A-3. In Section A.1 of the Exelon Nuclear Standardized Radiological Emergency Plan, "Concept of Operations," the NRC is described as the lead Federal agency with regards to technical matters and the Chairman is identified as the senior NRC authority who shall transfer control of emergency response activities to the Director of Site Operations when deemed appropriate.</p> <p>A. Clarify that the NRC Chairman may transfer selected authority to the Site Team Director rather than 'shall' transfer authority.</p> <p>B. Change the reference to the Director of Site Operations to read Site Team Director.</p> <p>RAI A-4. Section A.1 of the Exelon Nuclear Standardized Radiological Emergency Plan, "Concept of Operations," describes NRC responsibilities to include recommending adequate protective</p>

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actions to State and local authorities. In the Emergency Plan, clarify the NRC's responsibilities to indicate that NRC develops an independent assessment of the PAR and reviews the licensee's PAR, but only makes a recommendation to State or local officials if requested to do so by these agencies.

- RAI A-5. Section A.1 of the Exelon Nuclear Standardized Radiological Emergency Plan, "Concept of Operations," describes FEMA as having the responsibility for coordinating the overall Federal response. In the Emergency Plan, discuss the role of FEMA with regard to the Department of Homeland Security (DHS), and describe the DHS role as the Coordinating Agency under the National Response Framework (NRF) if an event is classified as a General Emergency.
- RAI A-6. In the Emergency Plan or Annex, identify the county agencies and their roles and responsibilities as part of the ERO, or justify why this is not necessary.
- RAI A-7. Include the Department of Homeland Security (DHS) in Figure A-2 of the Exelon Nuclear Standardized Radiological Emergency Plan, "Agency Response Organization Interrelationships" or justify why this is not necessary.
- RAI A-8. Section A.3 of the Exelon Nuclear Standardized Radiological Emergency Plan, "Agreements in Planning Effort," explains that written agreements have been developed that establish the concept of operations between the applicant and other support organizations having an emergency response role. Provide copies of the Letters of Agreement established with local support agencies in the Emergency Plan or Annex, or describe where these documents are maintained.

<b>Title</b>	Victoria County Station ESP - 13.03 - Emergency Planning - Question 20016
<b>RAI ID</b>	5468
<b>Acceptance Criteria</b>	[Basis: NUREG 0654/FEMA-REP-1, Evaluation Criterion B.7] Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B; Acceptance Criteria 1 and 2.
<b>Question Type</b>	Application Specific
<b>Description</b>	<p><b>SITE-2:</b> On-Site Emergency Organization  [Basis: NUREG-0654/FEMA-REP-1, Evaluation Criterion B.7]</p> <p>Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B; Acceptance Criteria 1 and 2.</p> <p>RAI B-1. Explain whether the corporate management, administrative, and technical support personnel will augment the plant staff supporting logistics, technical support for planning and reentry/recovery operations, and management level interface with governmental authorities and if so, include this information in the Emergency Plan.</p> <p>RAI B-2. Section B, "Exelon Nuclear Emergency Response Organization," of the Exelon Nuclear Standardized Radiological Emergency Plan states that Table B-1, "Minimum Staffing Requirements for the Exelon ERO," provides an outline of the minimum staffing requirements for emergencies, including on-shift and augmentation. Guidance in NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Nuclear Power Plants," details minimum requirements for on-shift and augmentation staffing for emergency response. Address the following questions regarding Table B-1:</p> <p>A. Augmentation staffing times in Table B-1 of the Exelon Nuclear Standardized Radiological Emergency Plan are indicated as 60 minutes versus 30 minutes and 60 minutes as stated in NUREG-0654/FEMA-REP-1. Provide augmentation staffing times consistent with NUREG-0654/FEMA-REP-1 or explain why 30</p>

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minute staffing times are not necessary.

- B. Table B-1 of the Exelon Nuclear Standardized Radiological Emergency Plan identifies several minimum staffing positions with footnotes indicating that these positions may be performed by shift personnel assigned other functions. For each of the following positions, identify specifically which on shift personnel will be assigned the associated functions (e.g., Chemistry personnel performing First Aid activities) and provide a discussion of their respective collateral duties, including their ability to perform multiple roles with potentially competing priorities during an emergency situation:

- i. Shift Emergency Director
- ii. Offsite Dose Assessment Station Personnel
- iii. Mechanical Maintenance/RadWaste Operator
- iv. Electrical/I&C Maintenance
- v. Radiation Protection Personnel (Protective Actions In-Plant)
- vi. First Aid and Rescue Operations Plant Personnel

- C. Table B-1 of the Exelon Nuclear Standardized Radiological Emergency Plan identifies the minimum shift staffing for Fire Fighting as consisting of 5 personnel per the FSAR. Provide a discussion regarding the specific team makeup of the fire brigade. Discuss how the fire brigade, with on-shift staffing, will be able to perform collateral duties if an emergency situation were to arise that warranted activation of the emergency response organization and fire brigade simultaneously.

- D. Table B-1 of the Exelon Nuclear Standardized Radiological Emergency Plan identifies the Emergency Communicator function as being filled by plant shift personnel. Discuss who specifically will assume this function in the



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event of an emergency, including collateral duties and potentially competing priorities.

E. Table B-1 of the Exelon Nuclear Standardized Radiological Emergency Plan identifies the Offsite Dose Assessment function as being filled by station personnel. Discuss who specifically will assume this function in the event of an emergency, including collateral duties and potentially competing priorities.

F. Table B-1 of the Exelon Nuclear Standardized Radiological Emergency Plan identifies the First Aid and Rescue Operations function as being filled by plant personnel. Discuss who specifically will assume this function in the event of an emergency, including collateral duties and potentially competing priorities.

<b>Title</b>	Victoria County Station ESP - 13.03 - Emergency Planning - Question 20017
<b>RAI ID</b>	5468
<b>Acceptance Criteria</b>	[Basis: NUREG-0654/FEMA-REP-1; Evaluation Criterion C.1.a (1 of 3), Criterion C.1.b (2 of 3), 10 CFR 50, Appendix E, IV.A.7.] Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B; Acceptance Criteria 1 and 2.
<b>Question Type</b>	Application Specific
<b>Description</b>	<p><b>SITE-3:</b> Emergency Response Support and Resources  [Basis: NUREG-0654/FEMA-REP-1; Evaluation Criterion C.1.a (1 of 3), Criterion C.1.b (2 of 3), 10 CFR 50, Appendix E, IV.A.7.]</p> <p>Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B; Acceptance Criteria 1 and 2.</p> <p>RAI C-1. In the Emergency Plan, identify the specific persons, by title, authorized to request Federal assistance, or justify why this is not necessary.</p>

<b>Title</b>	Victoria County Station ESP - 13.03 - Emergency Planning - Question 20019
<b>RAI ID</b>	5468
<b>Acceptance Criteria</b>	[Basis: 10 CFR 50, Appendix E.IV.D.1, NUREG-0654/FEMA-REP-1; Evaluation Criterion E.4, NUREG-0654/FEMA-REP-1; Evaluation Criterion E.6.] Acceptance Criteria: (NUREG-0800, Section 13.3): Requirement A, B, D, F; Acceptance Criterion 1, 2, 6.
<b>Question Type</b>	Application Specific
<b>Description</b>	<p><b>SITE-5:</b> Notification Methods and Procedures  [Basis: 10 CFR 50, Appendix E.IV.D.1, NUREG-0654/FEMA-REP-1; Evaluation Criterion E.4, NUREG-0654/FEMA-REP-1; Evaluation Criterion E.6.]  Acceptance Criteria: (NUREG-0800, Section 13.3): Requirement A, B, D, F; Acceptance Criterion 1, 2, 6.</p> <p>RAI E-1. In the Emergency Plan, identify the appropriate State and local government officials, by title and agency, who will be notified of an emergency within the Ingestion Pathway EPZ, or justify why this is not necessary.</p> <p>RAI E-2. Explain in the Emergency Plan whether follow up messages contain information on the location, date, and time of incident; class of emergency; type of actual or projected release; estimate of quantity of radioactive material release or being released; chemical and physical form of released material; meteorological conditions, actual or projected dose rates, projected dose rate and integrated dose rate at the projected peak and at 2, 5, and 10 miles; estimate of any surface radioactive contamination in-plant, onsite or offsite; licensee emergency response actions underway; recommended emergency actions, including protective measures; request for any needed onsite support by offsite organizations; and prognosis for worsening or termination of event.</p> <p>RAI E-3. In the Emergency Plan, provide the time required for notifying and providing prompt instructions to the public within the plume exposure pathway EPZ, or justify why this is not necessary.</p>

<b>Title</b>	Victoria County Station ESP - 13.03 - Emergency Planning - Question 20020
<b>RAI ID</b>	5468
<b>Acceptance Criteria</b>	[Basis: NUREG-0654/FEMA-REP-1; Evaluation Criterion F.1, F.2, Generic Letter 91-14, "Emergency Communications"]Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A, B and F; Acceptance Criteria 1, 2, 6, 12, 23, 29, 30
<b>Question Type</b>	Application Specific
<b>Description</b>	<p><b>SITE-6</b> Emergency Communications  [Basis: NUREG-0654/FEMA-REP-1; Evaluation Criterion F.1, F.2, Generic Letter 91-14, "Emergency Communications"]</p> <p>Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A, B and F; Acceptance Criteria 1, 2, 6, 12, 23, 29, 30</p> <p>RAI F-1. Section F.1 of the Exelon Nuclear Standardized Radiological Emergency Plan, "Communications/Notifications," describes the Nuclear Accident Reporting System (NARS) as the dedicated communications system for notifying State and county authorities of emergencies. The applicant proposed ITAAC 3.1.3 to demonstrate communications between the TSC, State of Texas, Victoria County, Refugio County, and Goliad County, via the Operational Hotline. Explain whether the NARS or Operational Hotline is the primary communication system between the applicant and offsite State and local emergency operations centers. Additionally, provide a description of the Operational Hotline in the Emergency Plan.</p> <p>RAI F-2. Discuss whether the Reactor Safety Counterpart Link, Protective Measures Counterpart Link, Management Counterpart Link, and Local Area Network will be established.</p> <p>RAI F-3. Describe the guaranteed power, or backup power, available for the emergency communications equipment, or justify why this</p>

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is not necessary.

RAI F-4. Section F.1.8 of the Exelon Nuclear Standardized Radiological Emergency Plan, "Emergency Response Data System (ERDS)," describes ERDS and its activation. Describe the testing frequency of ERDS and include this information in the Emergency Plan.

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<b>Title</b>	Victoria County Station ESP - 13.03 - Emergency Planning - Question 20022
<b>RAI ID</b>	5468
<b>Acceptance Criteria</b>	10 CFR 50.47(b)8
<b>Question Type</b>	Application Specific
<b>Description</b>	<p><b>SITE 8:</b> Emergency Facilities and Equipment  [Basis: NUREG-0737 (8.2.1.b, 8.2.1.e, 8.2.1.f, 8.2.1.h, 8.2.1.k, 8.4.1.a, 8.4.1.c, 8.4.1.e, 8.4.1.g, 8.4.1.j, 8.4.1.k, 8.4.1.i), NUREG-0654/FEMA-REP-1; Evaluation Criterion H.5, H.6]</p> <p>Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B; Acceptance Criteria 1, 2, 4, 5, 12, 25, and 26</p> <p>RAI H-1. Discuss in the Emergency Plan whether the TSC will be within a 2 minute walk of the Control Rooms for Units 1 and 2, or justify why this is not necessary.</p> <p>RAI H-2. Describe in the Emergency Plan, the environmental control system serving the TSC and explain whether it provides room air temperature, humidity and cleanliness appropriate for personnel and equipment.</p> <p>RAI H-3. Section H.1.b of the Exelon Nuclear Standardized Radiological Emergency Plan, "Technical Support Center (TSC)," states that personnel in the TSC shall be protected from radiological hazards, including both direct radiation and airborne radioactive contaminants during accident conditions. Describe in the Emergency Plan the process to ensure exposure to any person in the TSC would not exceed 5 rem whole body, or its equivalent to any part of the body, for the accident duration.</p> <p>RAI H-4.</p> <p>A. Section H.5.c.2 of the Exelon Nuclear Standardized Radiological Emergency Plan, "Safety Parameter Display (SPDS) &amp; Plant Parameter Display (PPDS) Systems," states that these systems provide a display of plant parameters in the Control Room, TSC and EOF. In the Emergency Plan or Annex,</p>

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discuss the plant parameter variables of the SPDS and explain whether they are based on the guidance in Regulatory Guide 1.97, or justify why this is not necessary.

B. Discuss whether the indicators and circuitry that provide the TSC and EOF data are of a reliable design, or justify why this is not necessary.

RAI H-5. Section 5.2, "Assessment Resources," of the Victoria Annex, provides a summary of the Onsite Radiation Monitoring and Process Monitor Equipment, Onsite Fire Detection Instrumentation, Facilities and Equipment for Offsite Monitoring, and Site Hydrological Characteristics, and references Chapter 7, "Instrumentation and Control Systems" and Chapter 12, "Radiation Protection," of the FSAR.

A. Describe the details of the monitoring systems that provide appropriate Table 1 or 2 data identified in Regulatory Guide 1.97 (Rev. 2).

B. Provide the referenced FSAR Chapters 7 and 12 that describe the details of the monitoring systems.

RAI H-6. Section 5.1.4, "Emergency Operations Facility," of the Victoria Annex, states that the VCS Emergency Operations Facility (EOF) is of sufficient size to accommodate about 50 people including NRC representatives. Explain how the minimum size of 2625 square feet (identified in ITAAC 5.2.1) for the EOF meets NUREG-0696 guidance which requires 75 square feet per person.

RAI H-7. Section 5.1.4, "Emergency Operations Facility," of the Victoria Annex, states that the EOF meets the criteria of NUREG-0696, "Functional Criteria for Emergency Response Facilities," regarding habitability. Describe how the EOF will be environmentally controlled to provide room air temperature, humidity and cleanliness for personnel and equipment, or justify why this is not necessary.

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- RAI H-8. Describe the security provided for the EOF when it is activated and when it is idle, or justify why this is not necessary.
- RAI H-9. Section H.4, "Activation," states that response times will vary due to weather and traffic, and a goal of 60 minutes for minimum staffing following declaration of an Alert or higher has been established, with a goal of activation within 15 minutes of achieving minimum staffing. Discuss in the Emergency Plan how the 60 minute augmentation time goal for EOF staffing meets the goals of 30 and 60 minutes in Table 2 NUREG-0737, Supplement 1.
- RAI H-10. Section H.6, "Monitoring Equipment Offsite," states that the plant has contracted with a company to conduct an extensive offsite environmental monitoring program to provide data on radiation in the environment. Provide a letter of agreement in the Emergency Plan, describe where such a letter is maintained, or demonstrate a contract is in place to support the offsite monitoring program. Document maintenance of this contract. Describe the availability of this contracted service during a response to an emergency regarding support of ERO functions.



<b>Title</b>	Victoria County Station ESP - 13.03 - Emergency Planning - Question 20023
<b>RAI ID</b>	5468
<b>Acceptance Criteria</b>	[Basis: NUREG-0654/FEMA-REP-1; Evaluation Criterion I.2, I.4, I.5, I.8.] Acceptance Criteria: (NUREG-0800, Section 13.3): Requirement A; Acceptance Criteria 1, 4, 5, 25, and 27
<b>Question Type</b>	Application Specific
<b>Description</b>	<p><b>SITE-9:</b> Accident Assessment  [Basis: NUREG-0654/FEMA-REP-1; Evaluation Criterion I.2, I.4, I.5, I.8.]</p> <p>Acceptance Criteria: (NUREG-0800, Section 13.3): Requirement A; Acceptance Criteria 1, 4, 5, 25, and 27</p> <p>RAI I-1. Explain whether a Post-accident Sampling System (PASS) or capability is provided, and describe the PASS or capability in the emergency plan as appropriate.</p> <p>RAI I-2. In the Emergency Plan, provide the estimated deployment time for field teams, or justify why this is not necessary.</p>

<b>Title</b>	Victoria County Station ESP - 13.03 - Emergency Planning - Question 20024
<b>RAI ID</b>	5468
<b>Acceptance Criteria</b>	[Basis: NUREG-0654/FEMA-REP-1; Evaluation Criterion J.1, J.2, J.3, J.4, J.5, J.10.A, J.10.m] Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B; Acceptance Criteria 1 and 2
<b>Question Type</b>	Application Specific
<b>Description</b>	<p><b>SITE-10:</b> Protective Response  [Basis: NUREG-0654/FEMA-REP-1; Evaluation Criterion J.1, J.2, J.3, J.4, J.5, J.10.A, J.10.m]</p> <p>Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B; Acceptance Criteria 1 and 2</p> <p>RAI J-1. Section 4.4, "Protective Actions for Onsite Personnel," of the Victoria Annex states that Figure 9, "Evacuation Map and Routes," from the IEM evacuation time estimate study identifies the evacuation routes. Figure 9 of the IEM study is called "VCS Sector and Ring Transient Populations Map." Revise the Annex to clarify the apparent discrepancy.</p> <p>RAI J-2. Section J.3 of the Exelon Nuclear Standardized Radiological Emergency Plan, "Radiological Monitoring of Evacuees," states that personnel evacuating the site will be monitored for contamination using portal monitors or will be sent to offsite monitoring locations if needed. Describe in the Emergency Plan or Annex the offsite monitoring locations.</p> <p>RAI J-3. Section J.3 of the Exelon Nuclear Standardized Radiological Emergency Plan, "Radiological Monitoring of Evacuees," states that personnel evacuating the site will be monitored for contamination using portal monitors as they exit the Protected Areas, monitored with friskers in assembly areas, or will be sent to offsite monitoring locations if needed. In the Emergency Plan, discuss whether decontamination capabilities are provided near the personnel monitoring points.</p> <p>RAI J-4. Provide a map in the Emergency Plan that</p>

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identifies the preselected radiological sampling and monitoring points, or justify why this is not necessary.

RAI J-5. Figure 4-1, "Victoria County Station PAR Determination Flowchart," of the Victoria Annex provides the steps considered in making the PAR determination. Explain in the Annex how the Evacuation Time Estimate is used to develop evacuation plans, or justify why this is not necessary.

<b>Title</b>	Victoria County Station ESP - 13.03 - Emergency Planning - Question 20025
<b>RAI ID</b>	5468
<b>Acceptance Criteria</b>	[Basis: NUREG-0654/FEMA-REP-1; Evaluation Criterion K.1, K.2, K.3.b] Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B; Acceptance Criteria 1 and 2
<b>Question Type</b>	N/A
<b>Description</b>	<p><b>SITE-11:</b> Radiological Exposure Control  [Basis: NUREG-0654/FEMA-REP-1; Evaluation Criterion K.1, K.2, K.3.b]</p> <p>Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B; Acceptance Criteria 1 and 2</p> <p>RAI K-1. Describe in the Emergency Plan the Emergency Exposure Guidelines for emergency workers for removal of injured persons, undertaking corrective actions, performing assessment actions, providing first aid, performing personnel decontamination, providing ambulance service, and providing medical treatment services.</p> <p>RAI K-2. Address in the Emergency Plan the radiation protection program procedure(s) that would be implemented during emergency conditions, including those that would govern expeditious decision-making to allow volunteers to receive doses in excess of routine limits during emergencies.</p> <p>RAI K-3. Section K.3, "Personnel Monitoring," states that emergency worker dose records are maintained by the Radiation Protection Managers in accordance with emergency and radiological protection procedures. Since power supply to the TSC is not addressed in the Emergency Plan:</p> <p>A. Provide information in the Emergency Plan or Annex on the capability to access to personnel dose records during an emergency when off-normal accident conditions, such as loss of AC power, computer network failure or high background dose rates, prevents access to</p>

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a primary records computer system.

- B. Describe how doses received by emergency workers are recorded and under what conditions would they be treated as planned special exposures resulting in a once-in-a-lifetime exposure, as discussed in 10 CFR 20.1201(a).

<b>Title</b>	Victoria County Station ESP - 13.03 - Emergency Planning - Question 20026
<b>RAI ID</b>	5468
<b>Acceptance Criteria</b>	[Basis: 10 CFR 50, Appendix E.IV.E.5] Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B; Acceptance Criteria 1 and 2
<b>Question Type</b>	Application Specific
<b>Description</b>	<p><b>SITE-12:</b> Medical and Public Health Support [Basis: 10 CFR 50, Appendix E.IV.E.5]</p> <p>Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B; Acceptance Criteria 1 and 2</p> <p>RAI L-1. Section L.2 of the Exelon Nuclear Standardized Radiological Emergency Plan, "Onsite First Aid Capability," states in general, physicians or nurses are not staffed at the site. In the Emergency Plan, discuss the arrangements for the services of physicians and other medical personnel qualified to handle radiation emergencies on-site, or justify why this is not necessary.</p>

<b>Title</b>	Victoria County Station ESP - 13.03 - Emergency Planning - Question 20029
<b>RAI ID</b>	5468
<b>Acceptance Criteria</b>	10 CFR 50.47(b)14
<b>Question Type</b>	Application Specific
<b>Description</b>	<p><b>SITE-14:</b> Exercises and Drills  [Basis: NUREG-0654/FEMA-REP-1; Evaluation Criterion N.1.b, 10 CFR 50, Appendix E.IV.F.2.a, 10 CFR 50, Appendix E.IV.F.2.b, 10 CFR 50, Appendix E.IV.F.2.d, 10 CFR 50, Appendix E.IV.F.2.e, 10 CFR 50, Appendix E.IV.E.9(b) (2 of 2)]  Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B; Acceptance Criteria 1 and 2</p> <p>RAI N-1. Section N.1.a of the Exelon Nuclear Standardized Radiological Emergency Plan, "Biennial Exercises," describes that full participation exercises will include appropriate offsite local and State authorities and applicant personnel physically and actively taking part in testing the integrated capability to adequately assess and respond to an accident at the plant. Propose an ITAAC to demonstrate that a full participation exercise will be conducted before fuel load.</p> <p>RAI N-2. Section N.4 of the Exelon Nuclear Standardized Radiological Emergency Plan, "Critique and Evaluation," describes a formal written critique report is prepared by Emergency Preparedness following a drill. Explain in the Emergency Plan whether remedial drills will be conducted after an unsatisfactory biennial exercise (such that NRC, in consultation with FEMA, cannot find reasonable assurance that adequate protective measures can be taken in the event of a radiological emergency) and describe State and local participation in these remedial exercises.</p>

<b>Title</b>	Victoria County Station ESP - 13.03 - Emergency Planning - Question 20030
<b>RAI ID</b>	5468
<b>Acceptance Criteria</b>	<p>[Basis: NUREG-0654/FEMA-REP-1; Evaluation Criterion O.1. and 1.a, O.3, O.4.d; Appendix E.IV.F.1(b)(iv)]</p> <p>Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B; Acceptance Criteria 1 and 2</p>
<b>Question Type</b>	Application Specific
<b>Description</b>	<p><b>SITE-15:</b> Radiological Emergency Training</p> <p>[Basis: NUREG-0654/FEMA-REP-1; Evaluation Criterion O.1. and 1.a, O.3, O.4.d; Appendix E.IV.F.1(b)(iv)]</p> <p>Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B; Acceptance Criteria 1 and 2</p> <p>RAI O-1. Section O.3 of the Exelon Nuclear Standardized Radiological Emergency Plan, "First Aid Response," states that selected station personnel are trained in accordance with the Exelon Nuclear approved First Aid. Explain whether first aid training is equivalent to Red Cross Multi-Media or "First Responder" training.</p> <p>RAI O-2. Describe in the Emergency Plan or Annex the scope and nature of the Fire Control Team (Fire Brigade) training.</p>



<b>Title</b>	Victoria County Station ESP - 13.03 - Emergency Planning - Question 20031
<b>RAI ID</b>	5468
<b>Acceptance Criteria</b>	[Basis: NUREG-0654/FEMA-REP-1; Evaluation Criterion P.6, P.8] Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B; Acceptance Criteria 1 and 2
<b>Question Type</b>	Application Specific
<b>Description</b>	<p><b>SITE-16:</b> Responsibility for Planning Effort: Development, Periodic Review, and Distribution of Emergency Plan. [Basis: NUREG-0654/FEMA-REP-1; Evaluation Criterion P.6, P.8]</p> <p>Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B; Acceptance Criteria 1 and 2</p> <p>RAI P-1. Section P.6 of the Exelon Nuclear Standardized Radiological Emergency Plan, "Supporting Emergency Response Plans," contains a listing of supporting plans. Include a list of appropriate county supporting plans in the Emergency Plan, or explain why these plans do not need to be listed.</p> <p>RAI P-2. In the Emergency Plan, provide a cross reference between the Emergency Plan and Appendix E to 10 CFR 50, or explain why this is not needed.</p> <p>RAI P-3. In an appendix to the Annex, provide a list of procedures, by title, required to implement the Emergency Plan and Annex. Include the section(s) of the plan to be implemented by each procedure.</p>

<b>Title</b>	Victoria County Station ESP - 13.03 - Emergency Planning - Question 20032
<b>RAI ID</b>	5468
<b>Acceptance Criteria</b>	[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
<b>Question Type</b>	Application Specific
<b>Description</b>	<p><b>SITE-17:</b> Security-Based Event Considerations  [Basis: 10 CFR 50.47; Appendix E to 10 CFR 50; Regulatory Guide 1.206, Section C.I.13.3.1]</p> <p>Acceptance Criteria: 1, 2, and 30</p> <p>RAI Q-1. Section J.4 of the Exelon Nuclear Standardized Radiological Emergency Plan, "Evacuation", states that in the event of a hostile attack against the site, implementation of protective actions other than those used for radiological emergencies may be appropriate. In the Emergency Plan, describe the decision making process for implementing alternate onsite protective measures, including who has the authority to make such decisions.</p> <p>RAI Q-2. 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.</p> <p>As stated in BL 2005-02, the alternative facility should include the following characteristics:</p> <ul style="list-style-type: none"> <li>· Accessibility even if the site is under threat or attack;</li> <li>· Communication links with the emergency operations facility, control room, and security;</li> <li>· Capability to notify offsite response organizations if the emergency operations facility is not performing this action;</li> <li>· Capability for engineering and damage</li> </ul>

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control teams to begin planning mitigative actions (e.g., general drawings and system information)

Describe in the emergency plan -- procedures or process that Emergency Response Organization (ERO) staff has been identified to support the rapid response from ERO members to mitigate site damage from a security-based event once the site is secured.

RAI Q-3. NRC Bulletin 2005-02, "Emergency Preparedness and Response Actions for Security-Based Events," provides guidance that Emergency Preparedness (EP) drill and exercise programs maintain the key skills necessary for mitigating security-based events. The Emergency Response Organization demonstrates security-based EP program activities under the schedule as committed to in their emergency plans. Discuss in the emergency plan/procedures whether EP drills and exercises will be scheduled to address security-based events or justify why this information is not required.

RAI Q-4. Section 13.3.1.1, "Site Description," of the VCS ESP SSAR 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 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 Emergency Plan accordingly, or justify why this information is not required.

<b>Title</b>	Victoria County Station ESP - 13.03 - Emergency Planning - Question 20034
<b>RAI ID</b>	5468
<b>Acceptance Criteria</b>	Basis: 10 CFR 50.33(g), 10 CFR 52.77, and 10 CFR 50.47(c) SRP Acceptance Criteria: Requirement A, Acceptance Criterion 10
<b>Question Type</b>	N/A
<b>Description</b>	<p><b>SITE-19:</b> Plume Exposure EPZ  Basis: 10 CFR 50.33(g), 10 CFR 52.77, and 10 CFR 50.47(c)</p> <p>SRP Acceptance Criteria: Requirement A, Acceptance Criterion 10</p> <p>RAI S-1. Section 13.3.3, "Emergency Planning Zones," of the VCS ESP application and Section 1.2, "Emergency Planning Zone," of the VCS Annex describe the plume exposure pathway and ingestion exposure pathway emergency planning zones (EPZs). Discuss in the VCS Annex whether the exact sizes and configurations of the EPZs surrounding VCS were determined in relation to the local emergency response needs and capabilities as they are affected by such conditions as demography, topography, land characteristics, access routes, and jurisdictional boundaries. Discuss why Calhoun County was not included in the Plume Exposure Pathway EPZ.</p>

<b>Title</b>	Victoria County Station ESP - 13.03 - Emergency Planning - Question 20035
<b>RAI ID</b>	5468
<b>Acceptance Criteria</b>	Basis: 10 CFR 52.79(a)(41), 10 CFR 50.34(h)(1)(i), 10 CFR 50.34(h)(2 and 3)
<b>Question Type</b>	Application Specific
<b>Description</b>	<p><b>SITE-20:</b> Standard Review Plan Basis: 10 CFR 52.79(a)(41), 10 CFR 50.34(h)(1)(i), 10 CFR 50.34(h)(2 and 3)</p> <p>RAI T-1. Evaluate the VCS Annex and corresponding Exelon Nuclear Standardized Radiological Emergency Plan against NUREG-0800 and identify all differences between the VCS Annex and corresponding Exelon Nuclear Standardized Radiological Emergency Plan and NUREG-0800 Section 13.3 "Emergency Planning".</p>

<b>Title</b>	Victoria County Station ESP - 15 - Introduction - Transient and Accident Analyses - Question 20288
<b>RAI ID</b>	5560
<b>Acceptance Criteria</b>	SRP 15.1
<b>Question Type</b>	Application Specific
<b>Description</b>	<p>RS-002 provides guidance regarding the information that is needed to satisfy the site acceptance criteria in 10 CFR 52.17 (a)(1) when addressing the potential radiological consequences of Design Basis Accidents (DBA) for the reactor designs considered in the VCS ESP application. In chapter 15 of the VCS ESP application, the applicant uses the DCD X/Q values for dose determination from AP1000 DCD Rev.18. However, AP1000 DCD revision 17 is the revision number referenced in SSAR Section 15.1. The DCD X/Q values from revision 17 of the AP1000 DCD are referenced when X/Q values from the AP1000 DCD revision 18 are used in section 15.1 of the VCS ESP SSAR. Please correct the discrepancy.</p>

<b>Title</b>	Victoria County Station ESP - 15 - Introduction - Transient and Accident Analyses - Question 20289
<b>RAI ID</b>	5560
<b>Acceptance Criteria</b>	SRP 15.1
<b>Question Type</b>	Application Specific
<b>Description</b>	<p>RS-002 provides guidance regarding the information that is needed to address the potential radiological consequences of DBAs for the reactor designs considered in meeting the site acceptance criteria in 10 CFR 52.17 (a)(1). In the VCS ESP application, the applicant incorrectly presented all of the Site Dose values (both Whole Body and Thyroid) in the last two columns of Tables 15.1-44, 15.1-45, 15.1-47, 15.1-49, 15.1-51, 15.1-53 for the ABWR design in units of "rem TEDE". Therefore, please correct the column header in each of the tables listed to show the dose units of "rem" instead of "rem TEDE".</p>