



ND-2011-0052
July 21, 2011

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: **PSEG Early Site Permit Application**
Docket No. 52-043
Response to Request for Additional Information, RAI No. 22,
Emergency Planning

- References:
- 1) PSEG Power, LLC letter to USNRC, Application for Early Site Permit for the PSEG Site, dated May 25, 2010
 - 2) RAI No. 22, SRP Section: 13.03 – Emergency Planning, dated June 6, 2011 (eRAI 5670)

The purpose of this letter is to respond to the request for additional information (RAI) identified in Reference 2 above. This RAI addresses Emergency Planning, as described in Section 13.3 of the Site Safety Analysis Report (SSAR) and the Emergency Plan (EPlan), as submitted in Part 2 and Part 5 of the PSEG Site Early Site Permit Application, Revision 0, respectively.

Enclosure 1 provides our response for RAI No. 22, Question Nos. 13.03-9 through 13.03-18 and 13.03-20 through 13.03-23. After a clarification conference call between the NRC staff and PSEG was conducted on May 17, 2011, the NRC withdrew Question 13.03-19. Our response to RAI No. 22, Question Nos. 13.03-9 through 13.03-11, 13.03.14, 13.03-20, and 13.03-22 will result in a revision to Part 5, Emergency Plan. Enclosure 2 includes the proposed revisions to the Emergency Plan. Enclosure 3 provides a cross reference document of the PSEG ESP Emergency Plan to regulatory requirements in response to question 13.03-20. Enclosure 4 provides justification of generic EP-ITAAC exceptions in response to question 13.03-22. Enclosure 5 includes the new regulatory commitment established in this submittal.

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If any additional information is needed, please contact David Robillard, PSEG Nuclear Development Licensing Engineer, at (856) 339-7914.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 21st day of July 2011.

Sincerely,



James Mallon
Nuclear Development
Early Site Permit Manager
PSEG Power, LLC

- Enclosure 1: Response to NRC Request for Additional Information, RAI No. 22, Questions 13.03-9 through 13.03-18 and 13.03-20 through 13.03-23, SRP Section: 13.03 – Emergency Planning
- Enclosure 2: Proposed Revisions Part 5 – Emergency Plan
- Enclosure 3: Regulatory Requirements Cross Reference Document
- Enclosure 4: Generic EP-ITAAC Exceptions
- Enclosure 5: Summary of Regulatory Commitments

- cc: USNRC Project Manager, Division of New Reactor Licensing, PSEG Site (w/enclosures)
USNRC, Environmental Project Manager, Division of Site and Environmental Reviews (w/enclosures)
USNRC Region I, Regional Administrator (w/enclosures)

PSEG Letter ND-2011-0052, dated July 21, 2011

ENCLOSURE 1

RESPONSE to RAI No. 22

QUESTIONS 13.03-9 THROUGH 13.03-18 AND 13.03-20 THROUGH 13.03-23

ND-2011-0052
July 21, 2011

Response to RAI No. 22, Question 13.03-9:

In Reference 2, the NRC staff asked PSEG for information regarding Emergency Planning, as described in Section 13.03 of the Site Safety Analysis Report. The specific requests for Question No. 13.03-9 were:

Introductory Material: Emergency Plan Considerations for Multi-Unit Sites:

Basis: 10 CFR 52.17(2)(b)(1); 10 CFR 52.17(2)(b)(2)(ii); 10 CFR 52.17(2)(b)(3); 10 CFR 50.47; RG 1.206, Section C.I.13.3.2

SRP ACCEPTANCE CRITERIA: Requirement C; Acceptance Criteria 15.

[RAI 13.3-2] In Section 13.3, "Emergency Planning," of Part 2, "Site Safety Analysis Report, (SSAR) and in Part 5, "Emergency Plan," (hereafter referred to as the PSEG ESP Emergency Plan), the applicant has proposed a complete and integrated emergency plan pursuant to 10 CFR 52.17(b)(2)(ii). The applicant stated the PSEG ESP Emergency Plan was developed using the current SGS/HCGS Emergency Plan. Since the proposed ESP site footprint consists of a portion of the existing SGS/HCGS site and is located immediately adjacent to HCGS, little distinction exists between the HCGS/SGS site and the PSEG ESP site for purposes of emergency planning. The ESP application takes advantage of the emergency planning resources, capabilities, and organization that currently exist at the HCGS/SGS site. Provide an analysis of the PSEG ESP site and its relationship to the Salem and Hope Creek Generating Stations using the nine criteria listed in RG 1.206, Section C.I.13.3.2, "Emergency Plan Considerations for Multi-Unit Sites," or justify why it is not necessary.

PSEG Response to NRC RAI:

PSEG has not selected a reactor technology to be built at the PSEG Site. The demonstration of Emergency Plan performance cannot be completed until portions of the facility have been constructed. Therefore, an analysis of the PSEG ESP Site and its relationship to the Salem and Hope Creek Generating Stations cannot be completed at this time. As stated in Section 13.3 of the PSEG Site SSAR, the Emergency Plan will be revised following the selection of the reactor technology. The nine criteria listed in RG 1.206, Section C.I.13.3.2, *Emergency Plan Considerations for Multi-Unit Sites*, are listed below, along with the responses providing the current status of the PSEG Site EPlan or information regarding the required analysis for the respective requirement:

- (1) Address the extent to which the existing site's emergency plan is credited for the new unit(s), including how the existing plan would be able to adequately accommodate an expansion to include one or more additional reactors and include any required modification of the existing emergency plan for staffing, training, emergency action levels, and the like.

Response: PSEG is submitting a complete and integrated emergency plan for the new plant at the PSEG Site for approval by the U.S. Nuclear Regulatory Commission (NRC) in accordance with 10 CFR 52.17(b)(2)(ii). The PSEG Site ESP EPlan is separate from the existing Salem (SGS) and Hope Creek Generating Station (HCGS) EPlan. Prior to fuel load at the new plant, PSEG will address the impacts of the new plant pursuant to 10 CFR 50.54(q) for both the PSEG ESP EPlan and for the SGS and HCGS EPlan.

- (2) Include a review of the proposed extension of the existing site's emergency plan pursuant to 10 CFR 50.54(q), to ensure that the addition of a new reactor(s) would not decrease the effectiveness of the existing plans and the plans, as changed, would continue to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR Part 50.

Response: Prior to fuel load at the new plant, PSEG will address the impacts of the new plant pursuant to 10 CFR 50.54(q) for both the PSEG ESP EPlan and for the SGS and HCGS EPlan.

- (3) Describe any required updates to existing emergency facilities and equipment, including the alert notification system.

Response: The PSEG Site EP-ITAAC, submitted as Attachment 10 of the PSEG ESP EPlan, contain the necessary items to demonstrate the acceptance of any required updates to the existing facilities and equipment, including the equipment to support notification methods. Specifically, Section 2.0, *Notification Methods and Procedures*, and Section 5.0, *Emergency Facilities and Equipment*, of the PSEG Site EP-ITAAC address this requirement.

- (4) Incorporate any required changes to the existing onsite and offsite emergency response arrangements and capabilities with State and local authorities or private organizations.

Response: As stated in PSEG Site ESP SSAR Subsection 13.3.5, surrounding emergency response organizations currently support SGS and HCGS. The addition of a new facility does not change the number of organizations or their level of support. Certification Letters (also called Letters of Agreement) from offsite agencies, with supporting emergency responsibilities for the new plant, are provided in Part 5, Emergency Plan, Attachment 2. As PSEG moves forward with new plant development, information to support the new plant will be incorporated into Attachment 3, *Memoranda of*

Understanding, and Attachment 2, *Certification Letters*, will be deleted. The PSEG Site EP-ITAAC, as submitted in Attachment 10 to Part 5 of the PSEG Site Early Site Permit Application, will be revised to include the update of the Memoranda of Understanding with local emergency response organizations prior to the full participation exercise before fuel load for the proposed PSEG ESP Site.

- (5) Justify the applicability of the existing 10-mile plume exposure EPZ and 50-mile ingestion control EPZ.

Response: A description of the Emergency Planning Zones (EPZs) for the new plant at the PSEG Site is provided in PSEG Site ESP Application SSAR Subsection 13.3.3. The EPZs for the new plant at the PSEG Site are based on the requirements contained in 10 CFR 50 Appendix E. The plume exposure pathway EPZ for the PSEG Site is an area surrounding the plant within a radius of approximately 10 miles. The ingestion exposure pathway EPZ is an area surrounding the plant within a radius of approximately 50 miles. The existing EPZ for the SGS and HCGS is used for the new plant and is appropriate based on the proximity of the facilities.

- (6) Address the applicability of the existing ETE or provide a revised ETE, if appropriate.

Response: A new Evacuation Time Estimate (ETE) was prepared and submitted as Part 5 Attachment 11 to the PSEG Site Early Site Permit Application. This ETE considers the impacts from the new plant at the PSEG Site as well as the existing SGS and HCGS.

- (7) If applicable, address the exercise requirements for collocated licensees, in accordance with Section IV.F.2.c of Appendix E to 10 CFR Part 50, and the conduct of EP activities and interactions discussed in RG 1.101.

Response: The PSEG Site EP-ITAAC, submitted as Attachment 10 of the PSEG Site EPlan, contains the necessary items to demonstrate the acceptance exercise requirements in Section 8.0, *Exercises and Drills*. Prior to fuel load at the new plant, PSEG will address the impacts of the new plant pursuant to 10 CFR 50.54(q) for both the new plant at the PSEG Site EPlan and for the SGS and HCGS EPlan.

- (8) If applicable, include ITAAC which will address any changes to the existing emergency plans, facilities and equipment, and programs that are to be implemented, along with a proposed schedule.

Response: PSEG is submitting a complete and integrated emergency plan for the new plant at the PSEG Site for approval by the U.S. NRC. The PSEG ESP EPlan is separate from the existing SGS and HCGS EPlan. The PSEG Site

EP-ITAAC is applicable to the new plant at the PSEG Site. Prior to fuel load at the new plant, PSEG will address the impacts of the new plant pursuant to 10 CFR 50.54(q) for both the PSEG ESP EPlan and for the SGS and HCGS EPlan.

- (9) Describe how emergency plans, to include security, is integrated and coordinated with emergency plans of adjacent sites.

Response: As noted above, the PSEG ESP EPlan was developed using the SGS and HCGS EPlan. PSEG has not selected a reactor technology to be built at the PSEG Site. Prior to fuel load, the EPlan will be implemented and coordinated with the existing plan. Appropriate 50.54(q) reviews will be performed to ensure the effectiveness of the EPlans are not decreased by the implementation of the PSEG ESP EPlan. In a similar manner, the Security Plan for the existing stations and the PSEG Site will be integrated following selection of a reactor technology. Appropriate 50.54(p) reviews will be performed to ensure the effectiveness of the Security Plans are not decreased by the operation of a new reactor(s) at the PSEG Site.

Associated PSEG Site ESP Application Revisions:

The PSEG Site EP-ITAAC as submitted in Attachment 10 to Part 5 of the PSEG Site Early Site Permit Application will be revised to include the update of the Letters of Agreements (Memoranda of Understanding) with local emergency response organizations prior to the full-participation exercise before fuel load for the proposed PSEG ESP Site. Enclosure 2 provides the markups of the EPlan to reflect this change.

Response to RAI No. 22, Question 13.03-10:

In Reference 2, the specific request for Question 13.03-10 was:

***SITE-1: Assignment of Primary Responsibilities for Emergency Response
Basis: NUREG-0654/FEMA-REP-1, Evaluation Criterion A.1.a, 10 CFR 50,
Appendix E.IV.A.8, NUREG-0654/FEMA-REP-1, Evaluation Criterion A.4
Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B;
Acceptance Criteria 1 and 2.***

***[RAI A-1] For Section 2.2.1 of the PSEG ESP application Emergency Plan,
clarify whether the Accident Assessment Advisory Group is the
same as the Technical Assessment Center.***

PSEG Response to NRC RAI:

PSEG Site EPlan Subsection 2.1 discusses the State of Delaware as one of the Principle Government Jurisdictions in the Emergency Planning Zone (EPZs). The current statement reads, "The Accident Assessment Advisory Group (TAC) develops Delaware's accident assessment and protective action response." The Technical Assessment Center (TAC) is the correct title for this function, not Accident Assessment Advisory Group. This statement will be revised to reflect that, "The Technical Assessment Center (TAC) develops Delaware's accident assessment and protective action response."

Associated PSEG Site ESP Application Revisions:

Emergency Plan Subsection 2.2.1 will be revised to reflect the correct title. Enclosure 2 provides the markups of the EPlan to reflect this change.

Response to RAI No. 22, Question 13.03-11:

In Reference 2, the specific request for Question 13.03-11 was:

SITE-2: On-Site Emergency Organization

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.

*[RAI B-1] Section 3, "Emergency Organization," of the PSEG Site ESP application Emergency Plan describes the short term and long term augmentation for the emergency response positions. **In the Emergency Plan, discuss whether corporate management, administrative, and technical support personnel will augment the plant staff, or justify why this does not need to be included.***

*[RAI B-4] Section 3.4.1, "On shift and Initial Augment," states the NSTA and the CRS or SM may be the same person. **Provide clarification or additional information on how, during an exercise or actual event, one person can effectively perform three duty position functions.***

*[RAI B-5] **Provide an EP-ITAAC to revise or update the Letters of Agreements with local emergency response organizations before fuel load for the proposed PSEG ESP site.***

PSEG Response to NRC RAI:

[RAI B-1] The PSEG Site EPlan, Rev. 0, Section 3, currently defines the augmentation for emergency response positions. Subsection 3.9.1 explains that the Emergency Response Manager "acts as the principal corporate interface between the company and all other organizations." Thus, a corporate manager is not specifically augmented. Subsection 3.9 currently defines the augmentation of administrative and technical support personnel to augment the plant staff. The augmentation of this staff is primarily sourced from onsite personnel. This similar augmentation has been found acceptable for SGS and HCGS. It should also be noted that PSEG Nuclear is the corporate entity responsible for the implementation of the PSEG ESP EPlan and is located at the PSEG Site.

[RAI B-4] Subsection 3.4.1 states, "The NSTA and the CRS or SM may be the same individual." This statement defines that one person can perform two jobs; specifically, the NSTA and the CRS may be the same individual or the NSTA and the SM may be the same individual. This is a standard practice and has been found acceptable and previously approved in SGS and HCGS EPlan.

[RAI B-5] The PSEG Site EP-ITAAC as submitted in Attachment 10 to Part 5 of the PSEG Site Early Site Permit Application will be revised as requested to include the update of the Memoranda of Understanding with local emergency response organizations prior to the full-participation exercise before fuel load for the proposed PSEG ESP Site.

Associated PSEG Site ESP Application Revisions:

Enclosure 2 includes a markup of the proposed revision to the PSEG Site EP-ITAAC to include new Program Element 10.1 to demonstrate that the licensee has updated the Memoranda of Understanding with local emergency response organizations prior to the full-participation exercise before fuel load for the proposed PSEG ESP Site.

Response to RAI No. 22, Question 13.03-12:

In Reference 2, the specific request for Question 13.03-12 was:

SITE-5: Notification Methods and Procedures

Basis: NUREG-0654/FEMA-REP-1; Evaluation Criterion E.3

Acceptance Criteria: (NUREG-0800, Section 13.3): Requirement A, B, D, F; Acceptance Criteria 1, 2, 6.

*[RAI E-1] Figure 6-4, "Typical Initial Contact Message Form," includes information regarding whether a radiological release is taking place, wind direction and speed, when the emergency was declared, a description of the event, and any protective actions that are recommended at the time. **Discuss why Figure 6-4, "Typical Initial Contact Message Form," does not identify potentially affected population areas.***

PSEG Response to NRC RAI:

A Typical Initial Contact Message Form is provided in Figure 6-4 of the EPlan. This form is typical for a Site Area Emergency (SAE). As discussed in Subsection 5.1.2 of the PSEG Site EPlan, "No protective actions are recommended at this time" is communicated to the states in the initial notification message following the declaration of a SAE. Protective action recommendations out to a fixed distance is first communicated to the states in the initial notification message following the declaration of a General Emergency (GE). The actual General Emergency Initial Contact Message Form will contain provisions for defining the potentially affected population. This form will be developed for the new plant at the PSEG Site as part of the Event Classification Guide and will be similar to the current forms included in the EPlan for the SGS and HCGS.

(Reference PSEG Site EP-ITAAC 2.0, Notification Methods and Procedures)

Associated PSEG Site ESP Application Revisions:

No changes to the SSAR or EPlan are required as a result of this RAI response.

Response to RAI No. 22, Question 13.03-13:

In Reference 2, the specific request for Question 13.03-13 was:

SITE-6 Emergency Communications

Basis: 10 CFR 50, Appendix E. IV.E.9, 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

*[RAI F-1] Section 7.5 of the PSEG Site ESP application Emergency Plan states that the FTS consists of direct lines to the NRC which and are installed in the Control Room, TSC, and the EOF. **Describe in the Emergency Plan, the guaranteed or backup power available to the FTS emergency communications equipment.***

*[RAI F-2] **Define in the Emergency Plan the components and availability of Federal Telecommunications System (FTS) such as Reactor Safety Counterpart Link (RSCL), Protective Measures Counterpart Link (PMCL), Management Counterpart Link (MCL), and Local Area Network (LAN).***

PSEG Response to NRC RAI:

[RAI F-1] The Control Room and TSC designs are not complete at this time because a reactor technology has not been selected. Therefore, a description of the FTS emergency communications equipment power supplies cannot be provided. The PSEG Site FTS design will be developed in accordance with regulations current at time of development, following the selection of a reactor technology.

(Reference PSEG Site EP-ITAAC 3.0 Emergency Communications)

[RAI F-2] Specific design of the FTS at the PSEG Site is not complete at this time because a reactor technology has not been selected. Therefore, a description of the components and availability of FTS can not be provided. The PSEG Site FTS design will be developed in accordance with regulations current at time of development, following the selection of a reactor technology.

(Reference PSEG Site EP-ITAAC 3.0 Emergency Communications)

Associated PSEG Site ESP Application Revisions:

No changes to the SSAR or EPlan are required as a result of this RAI response.

Response to RAI No. 22, Question 13.03-14:

In Reference 2, the specific request for Question 13.03-14 was:

SITE 8: Emergency Facilities and Equipment

Basis: NUREG-0737 (8.2.1.b, 8.2.1.f, 8.2.1.h, 8.2.1.h, 8.2.1.k, 8.4.1.h), NUREG-0654/FEMA-REP-1; Evaluation Criterion H.5, H.5, 10 CFR 50, Appendix E.IV.E.4, 10 CFR 50, Appendix E.VI, "Emergency Response Data System," 10 CFR 50.72(a)(4)

Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B; Acceptance Criteria 1, 2, 4, 5, 12, 25, and 26

*[RAI H-1] Section 9.4.3, "Technical Support Center (TSC)," of the PSEG Site ESP application Emergency Plan states that the analytical and assessment capabilities assigned to the TSC include the Safety Parameter Display System (SPDS), Computerized Dose Assessment, and Plant Engineering Support. **Discuss in the Emergency Plan the plant parameter variables of the Safety Parameter Display System (SPDS) that are available in the TSC, and explain whether they are based on the guidance in Regulatory Guide 1.97.***

*[RAI H-3] **In the Emergency Plan, discuss whether the plant records, drawings, diagrams, procedures, plans, references, and environmental information are available in the EOF.***

*[RAI H-4] **In the Emergency Plan, discuss the facilities and medical supplies for emergency first aid treatment.***

*[RAI H-11]The SRM to SECY 10-0078 requires that a centralized EOF must demonstrate, in a dual site exercise, the capability to support emergency operation of at least two distinct sites. **Propose an EP-ITAAC that will demonstrate the capability of the EOF to handle events at two or more reactors on the site, including the capabilities to discriminate plant data, staffing and operation of the facility, or discuss why it is not needed.***

*[RAI H-12] Section 9.5.1 states PSEG commits to operating the EOF so as to fulfill the functional requirements of paragraph 4.1 of NUREG-0737, Supplement 1. **Clarify if this statement refers to Section 4.1 of Supplement 1 NUREG-0737 which addresses SPDS or should it be Section 8.4.1 which addresses EOF requirements.***

[RAI H-13] In accordance with Acceptance Criterion 3, "Technical Support Center Radiological Habitability," in SRP Section 15.0.3, "Design Basis Accident Radiological Consequence Analyses for Advanced Water Reactors," the staff reviews whether the total calculated radiological

consequences in the TSC for the postulated fission product releases fall within the exposure acceptance criteria specified in GDC 19 of 5 rem TEDE (0.05 Sv) for the duration of the design basis accidents (DBAs). Provide the radiological consequence analyses that were performed for the proposed PSEG TSC for the postulated DBAs. The radiological analyses should include, but are not limited to, the following parameters:

- 1. TSC ventilation air inlet and recirculation flow rates*
- 2. HEPA filter and charcoal adsorber fission product removal efficiencies*
- 3. TSC unfiltered air in-leakage rate*
- 4. Atmospheric dispersion factors (χ/Q values) at TSC air intake*
- 5. TSC occupancy factors*
- 6. TSC free air volume*
- 7. Occupant breathing rate*
- 8. Description of the ventilation design*

PSEG Response to NRC RAI:

[RAI H-1] The selection of parameters to be displayed on the SPDS will be based on the parameters required to monitor the critical safety functions identified by the selected technology's Owners Group and will aid control room operators in determining the safety status of the plant. Since a technology has not been selected at this time, these parameters are unknown.

Subsection 5.5 of the PSEG Site EPlan states, "The PSEG Site Radiation Monitoring System computer and/or Safety Parameter Display System provide early indication of abnormal radiological conditions from both process and area monitors. The computer systems provide monitoring capability for the radiological parameters identified in Regulatory Guide 1.97, including high range monitoring capability for effluent release paths. This data is input to the dose assessment computers at the PSEG Site."

(Reference PSEG Site EP-ITAAC 5.0 Emergency Facilities and Equipment)

[RAI H-3] The PSEG Site EOF will be established in accordance with the requirements that exist six months prior to fuel load. Plant records, drawings, diagrams, procedures, plans, references, and environmental information will be provided in the EOF. Document inventory for the EOF will be similar to that maintained in the existing SGS and HCGS' EOF. Below is a sample list of hard copy items available:

- EPlan and all EP Implementing Procedures
- SGS and HCGS UFSARs
- SGS and HCGS Technical Specifications

- Radiation Monitoring System Manual Salem 1 (Vendor Document)
- Radiation Monitoring System Manual Volume 2 Primary/Secondary Calibration Information Salem 1 (Vendor Document)
- Radiation Monitoring System Manual Salem 2 (Vendor Document)
- SPDS Users Manual
- SGS and HCGS Fire Protection Procedures
- Business Continuity Plan
- Salem Generating Station Unit 1 Surveillance Frequency Control Program List of Surveillance Frequencies
- Salem Generating Station Unit 2 Surveillance Frequency Control Program List of Surveillance Frequencies
- Salem Generating Station Units 1 & 2 Technical Requirements Manual
- Hope Creek Technical Requirements Manual
- Hope Creek Generating Station Surveillance Frequency Control Program List of Surveillance Frequencies
- Salem and Hope Creek Supplemental Severe Accident Management Guidelines and Associated TSC Assist Guidelines (B.5.b related guidelines)

Remaining plant technical documents are retrievable in the EOF using PSEG's Document Control Records Management System (DCRMS) or if needed could be e-mailed or faxed from the stations. DCRMS is accessible in the EOF using computers that are connected to PSEG's Local Area Network.

[RAI H-4] Facilities for emergency first aid treatment are identified in the PSEG ESP EPlan Section 13, *Medical Support*. Medical supplies required to be maintained for emergency first aid treatment will be defined in the Fire Department procedures for the new plant at the PSEG Site similar to what is currently done at SGS and HCGS.

(Reference PSEG procedures SH.FP-PM.ZZ-0046, *Fire Department and EMS Equipment Inspection and Inventory*)

[RAI H-11] The PSEG Site EP-ITAAC as submitted in Attachment 10 to Part 5 of the PSEG Site Early Site Permit Application will be revised to include an EP-ITAAC that will demonstrate the capability of the EOF to handle events at two or more reactors on the site, including the capabilities to discriminate plant data, staffing, and operation of the facility.

[RAI H-12] The reference to Section 4.1 of NUREG-0737, Supplement 1 in Subsection 9.5.1 of the PSEG Site EPlan is incorrect. Subsection 9.5.1 will be revised to reference Section 8.4.1 of NUREG-0737, Supplement 1, which addresses EOF requirements.

[RAI H-13] PSEG has not selected a reactor technology, therefore, a TSC design, including habitability radiological consequence analyses, has not been completed at this time. Prior to the implementation of the PSEG Site EPlan, the TSC will be designed to conform with the regulatory requirements in effect at that time.

(Reference PSEG Site EP-ITAAC 5.0 Emergency Facilities and Equipment)

Associated PSEG Site ESP Application Revisions:

Enclosure 2 includes a markup of the proposed revision to the PSEG Site EP-ITAAC that includes Acceptance Criteria 5.2.3 as requested in question 13.03-14 [H-11].

Enclosure 2 includes a markup of PSEG Site EPlan Subsection 9.5.1 to correct the reference to Section 8.4.1 of NUREG-0737, Supplement 1.

Response to RAI No. 22, Question 13.03-15:

In Reference 2, the specific request for Question 13.03-15 was:

SITE-10: Protective Response

Basis: NUREG-0654/FEMA-REP-1; Evaluation Criterion J.1, J.2, J.2, J.7, J.10.A

Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B;

Acceptance Criteria 1 and 2

[RAI J-1] In the PSEG Site ESP application Emergency Plan, describe the time to warn or advise onsite individuals and individuals who may be in areas controlled by the operator.

[RAI J-2] Section 11.1.3, "Protective Actions," of the PSEG Site ESP application Emergency Plan, states that evacuation and sheltering options are available and are considered with the necessity for keeping specific technical or management personnel onsite for implementation of the response. The access road to the site is described as the only route for evacuating the site. In the Emergency Plan, describe alternatives to evacuation that may be implemented in adverse weather conditions or when specific radiological conditions impact the evacuation route.

[RAI J-3] Section 11.1.3, "Protective Actions," states that transportation for nonessential onsite personnel are part of the Evacuation Time Estimate (ETE). Provide the reference in the ETE study where the transportation for nonessential onsite individuals is described.

[RAI J-4] In the Emergency Plan, discuss when KI may be included as part of the protective action recommendation (PAR) for offsite population, or justify why this does not need to be included.

[RAI J-5] Provide a map in the Emergency Plan that identifies preselected radiological sampling and monitoring points, or justify why this does not need to be included.

PSEG Response to NRC RAI:

[RAI J-1] The information and level of detail requested will be provided in the new plant EPlan Implementing Procedures that will be submitted no less than 180 days prior to fuel load in accordance with PSEG Site EP-ITAAC 9.1. This procedure will be similar to that which currently exists for SGS and HCGS.

(Reference PSEG procedure NC.EP-EP.ZZ-0102, *Emergency Coordinator Response*, for Salem and Hope Creek Generating Stations)

[RAI J-2] Alternatives to evacuation will be part of the EPlan Implementing Procedures. These procedures will be similar to those that currently exist for SGS and HCGS.

(Reference PSEG procedure NC.EP-EP.ZZ-0601, *Radiological Support Manager and Radiological Assessment Staff Response*)

[RAI J-3] The PSEG Site EPlan Section 11.1.3 states, "The evacuation routes and transportation for nonessential onsite personnel are part of the evacuation study for the entire area around the PSEG Site, which is provided as Emergency Plan Attachment 11."

The PSEG Site ETE Section 3.3 discusses employees that work within the EPZ. Non-essential onsite individuals are included in this grouping.

[RAI J-4] Administration of KI to the offsite population as part of a PAR is performed in accordance with current state procedures. The recommendation to administer KI to offsite population in accordance with state procedures is always associated with a General Emergency as part of the General Emergency Initial Contact Message Form. This is similar to what is done at the existing SGS and HCGS. This form will be developed for the new plant at the PSEG Site as part of the Event Classification Guide and be similar to the current forms for SGS and HCGS.

[RAI J-5] Identification of preselected radiological sampling and monitoring points will be part of the EPlan Implementing Procedures similar to those that currently exist for SGS and HCGS.

(Reference PSEG procedure NC.EP-EP.ZZ-0603, *Field Monitoring*, which provides radiological sampling and monitoring points for SGS and HCGS)

Associated PSEG Site ESP Application Revisions:

No changes to the SSAR or EPlan are required as a result of this RAI response.

Response to RAI No. 22, Question 13.03-16:

In Reference 2, the specific request for Question 13.03-16 was:

SITE-12: Medical and Public Health Support

[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

[RAI L-1] Discuss in the PSEG Site ESP application Emergency Plan arrangements for the services of physicians and other medical personnel qualified to handle radiation emergencies onsite, or justify why this does not need to be included.

PSEG Response to NRC RAI:

Arrangements for the services of physicians and other medical personnel qualified to handle radiation emergencies onsite is discussed in Subsection 13.1.1, *Normal Operations – Onsite Medical Support* and will also be part of the onsite Emergency Medical Team and Fire Brigade procedures. These procedures will be similar to those which currently exist for SGS and HCGS.

(Reference PSEG procedure SH.FP-EO.ZZ-0004, *Fire Department Medical Emergency Response*)

Associated PSEG Site ESP Application Revisions:

No changes to the SSAR or EPlan are required as a result of this RAI response.

Response to RAI No. 22, Question 13.03-17:

In Reference 2, the specific request for Question 13.03-17 was:

SITE-13: Recovery and Reentry Planning

Basis: NUREG-0654/FEMA-REP-1; Evaluation Criterion M.4

Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B;

Acceptance Criteria 1 and 2

*[RAI M-1] Section 14, "Recovery and Reentry Planning," of the PSEG Site ESP application Emergency Plan describes the general approach for reentry and recovery. However, this section does not address methods to estimate total population exposure. **In the Emergency Plan, describe the method used to periodically estimate total population exposure, or justify why this does not need to be included.***

PSEG Response to NRC RAI:

Atmospheric transport and diffusion for the new plant will be calculated using an approved dose assessment tool. Currently Meteorological Information and Dose Assessment System (MIDAS) is used at SGS and HCGS. A method for determining atmospheric transport and diffusion throughout the plume exposure emergency planning zone during emergency conditions will be developed following selection of a reactor technology. Recovery and reentry planning will be provided in the new plant EPlan Implementing Procedures and will account for the status of radiological releases. The new plant procedure will be similar to that which currently exists for SGS and HCGS.

(Reference PSEG procedure NC.EP-EP.ZZ-0405, *Emergency Termination – Reduction – Recovery*)

Associated PSEG Site ESP Application Revisions:

No changes to the SSAR or EPlan are required as a result of this RAI response.

Response to RAI No. 22, Question 13.03-18:

In Reference 2, the specific request for Question 13.03-18 was:

SITE-14: Exercises and Drills

Basis: 10 CFR 50, Appendix E.IV.F.2.a, 10 CFR 50, Appendix E.IV.F.2.d, 10 CFR 50, Appendix E.IV.F.2.e, 10 CFR 50, Appendix E.IV.F.2.f, NUREG-0654/FEMA-REP-1; Evaluation Criterion N.2.a.

Acceptance Criteria: (NUREG-0800, Section 13.3): Requirements A and B; Acceptance Criteria 1 and 2

[RAI N-1] In the emergency plan, Table 15-1, "Schedule of Exercises and Drills," states, in part, that the licensee conducts communication drills with the States of Pennsylvania and Maryland on a quarterly basis. Describe in the emergency plan how the states within the 50-mile ingestion pathway EPZ participate in exercises at least once every 6 years, or explain why this information is not required.

[RAI N-2] Section 16 (subsection 1.1.2) of the emergency plan states, in part, that drills are used as tools to practice, train, and demonstrate the skills learned in training and to exercise the interface between PSEG and offsite agencies. Describe in the emergency plan how State and local governments, located within the plume exposure pathway EPZ, are extended an opportunity to participate in PSEG's drills when requested by State and local governments.

[RAI N-3] Section 16 (subsection 1.1.3) of the emergency plan provides a description of the corrective measures to be taken if deficiencies are identified during drills. Describe in the emergency plan whether remedial exercises will be conducted after an unsatisfactory performance of a biennial exercise, including the extent of State and local participation in these drills. Include in this description a discussion of how offsite exercise deficiencies will be included in the remedial or corrective actions program.

[RAI N-4] Discuss in the emergency plan whether ERDS is tested quarterly.

PSEG Response to NRC RAI:

[RAI N-1] States are provided the opportunity to participate in PSEG Site emergency exercises. The frequency of participation of states within the 50-mile ingestion pathway EPZ is detailed in each state's emergency plan. Concurrence on specific dates occurs annually at the NRC/FEMA Region I Exercise Scheduling Conference.

[RAI N-2] State and local governments, located within the plume exposure pathway EPZ, are extended an opportunity to participate in PSEG's drills as described in the state emergency plans. Concurrence on specific dates occurs annually at the NRC/FEMA Region I Exercise Scheduling Conference. Local government plans are an annex to the state's emergency plan.

[RAI N-3] PSEG would conduct a remedial exercise as required per 10CFR50, Appendix E, IV, F.2.f. PSEG, state and local participation would be sufficient to show that appropriate corrective actions have been taken to remediate the unsatisfactory performance. While this requirement is not specifically stated in the PSEG Site EPlan, it is a regulatory requirement that PSEG must comply with unless an exemption from the regulation has been approved by the NRC.

[RAI N-4] ERDS will be tested quarterly in accordance with NRC Inspection Notice 2008-15, *ERDS Test Schedule Revised*. The requirement to test ERDS will be included in the EPlan Functional Test Procedure for the new plant. ERDS is currently tested on a quarterly frequency at both SGS and HCGS and testing for the new reactor(s) will be similar.

(Reference PSEG procedure (NC.EP-FT.ZZ-0006, *Emergency Response Data System (ERDS) Test with NRC - Salem Station* and NC.EP-FT.ZZ-0007, *Emergency Response Data System (ERDS) Test with NRC - Hope Creek Station*)

Associated PSEG Site ESP Application Revisions:

No changes to the SSAR or EPlan are required as a result of this RAI response.

Response to RAI No. 22, Question 13.03-20:

In Reference 2, the specific request for Question 13.03-20 was:

SITE-16: Responsibility for Planning Effort: Development, Periodic Review, and Distribution of Emergency Plan.

Basis: 10 CFR 50.54(t), 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

[RAI P-1] Discuss why Section 17, "Emergency Plan Administration," of the PSEG Site ESP application Emergency Plan does not address any other emergency plans that support the PSEG Emergency Plan, such as State, local, or federal plans that address support to the PSEG site in the event of an emergency.

[RAI P-2] The applicant provided a master table of contents which includes the section number, title, revision number, number of pages, and effective date for sections 1 through 17 of the Emergency Plan, as well as for Attachments 1 through 11. The applicant also provided a cross-reference of NUREG-0654 to the Emergency Plan. In the Emergency Plan, provide a cross-reference to Appendix E of 10 CFR 50, or explain why this is not necessary.

[RAI P-3] Section 17.5.0, "Independent Review," states that the Emergency Plan and associated documents receive an independent review at least once every 24 months. In the Emergency Plan, discuss why the frequency of 24 months is appropriate when NRC guidance specifies an independent review every 12 months.

PSEG Response to NRC RAI:

[RAI P-1] Section 17 of the PSEG Site EPlan addresses Emergency Plan Administration at the PSEG Site. Figure 17.1 delineates the planning and coordination activities associated with the Offsite organizations. PSEG Site EPlan Section 2, *Assignment of Responsibility* addresses the state and local emergency plans that support the PSEG Emergency Plan in the event of an emergency. These organizations are responsible for the maintenance of their plans.

[RAI P-2] A cross reference to Appendix E of 10 CFR 50 has been provided in Enclosure 3 to this letter.

[RAI P-3] Subsection 17.5.0 of the PSEG Site EPlan will be revised to reflect that the EPlan and associated documents receive an independent review, at least once per 12 months in accordance with current regulations.

Associated PSEG Site ESP Application Revisions:

Subsection 17.5.0 of the PSEG Site EPlan will be revised to reflect that the EPlan and associated documents receive an independent review, at least once per 12 months in accordance with current regulations.

Response to RAI No. 22, Question 13.03-21:

In Reference 2, the specific request for Question 13.03-21 was:

Site 17: Subject: Hostile Action 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

[RAI 13.3-Q]

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.

The Commission Orders issued on February 25, 2002, and security-related enhancements identified in NRC Bulletin 2005 02, "Emergency Preparedness and Response Actions for Security-Based Events," identify the following areas to be addressed in the ESP application, Emergency plan, or emergency plan implementing procedures:

- 1. Security-based Emergency Classification Levels and EALs: The emergency plan includes EALs to ensure that a site-specific, security event results in an emergency classification declaration of at least a notification of unusual event. The classification scheme should also reflect the strategy for escalation to a higher-level event classification.*
- 2. NRC Notifications: Notification procedures allow for NRC notification of safeguards events immediately after notification of local law enforcement agencies, or within about 15 minutes of the recognition of a security-based threat.*
- 3. Onsite Protective Measures: Consideration has been given to a range of protective measures for site workers, as appropriate, during a security-based event (e.g., evacuation of personnel from target buildings, site evacuation by opening security gates, dispersal of licensed operators, sheltering of personnel in structures away from potential site targets, and arrangements for accounting for personnel after attack).*
- 4. ERO Augmentation: ERFs and alternative facilities have been identified to support the rapid response from ERO members to mitigate site damage from a security-based event once the site is secured. The alternative facilities could likely be located outside of the PA and should include the following characteristics: accessible even if the site is under threat or actual attack; communication links with the EOF, control room and plant security; the capability to perform offsite notifications; and the capability for engineering assessment activities, including damage control team planning and*

preparation. The alternative facility should also be equipped with general plant drawings and procedures, telephones, and computer links to the site.

5. *Potential Vulnerabilities from Nearby Hazardous Facilities, Dams, and other Sites: The potential effect has been determined on the plant, onsite staffing and augmentation, and onsite evacuation strategies from damage to nearby hazardous facilities, dams, and other nearby sites, in consideration of a security-based event.*
6. *Drills and Exercises: Emergency Preparedness drill and exercise programs maintain the key skills necessary for mitigating security-based events. The ERO demonstrates security-based emergency preparedness program activities under the schedule as committed to in its emergency plans.*
7. *Emergency Preparedness and Response to a Security-based Event: Onsite staffing, facilities, and procedures are adequate to accomplish actions necessary to respond to a security-based event, and the emergency plan and/or procedures reflect the site-specific needs.*

[RAI 13.3(Q-1)] NRC Notifications Notification procedures allow for NRC notification of safeguards events immediately after notification of local law enforcement agencies, or within about 15 minutes of the recognition of a security-based threat.

Revise the Emergency Plan to include this information or justify why it is not needed.

[RAI 13.3(Q-2)] Onsite Protective Measures Consideration has been given to a range of protective measures for site workers, as appropriate, during a security-based event (e.g., evacuation of personnel from target buildings, site evacuation by opening security gates, dispersal of licensed operators, sheltering of personnel in structures away from potential site targets, and arrangements for accounting for personnel after attack).

Discuss in the Emergency Plan the range of considerations for protective measures for site workers or justify why it is not needed

[RAI 13.3(Q-3)] ERO Augmentation ERFs and alternative facilities have been identified to support the rapid response from ERO members to mitigate site damage from a security-based event once the site is secured. The alternative facilities could likely be located outside of the PA and should include the following characteristics: accessible even if the site is under threat or actual attack; communication links with the EOF, control room and plant security; the capability to perform offsite notifications; and the capability for engineering assessment activities, including damage control team planning and preparation. The alternative facility should also be equipped with general plant drawings and procedures, telephones, and computer links to the site.

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:

- ***Accessibility even if the site is under threat or attack;***
- ***Communication links with the emergency operations facility, control room, and security;***
- ***Capability to notify offsite response organizations if the emergency operations facility is not performing this action;***
- ***Capability for engineering and damage control teams to begin planning mitigative actions (e.g., general drawings and system information)***

[RAI 13.3(Q-4)] 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 13.3(Q-5)] Provide an assessment on the potential effect on the plant, onsite staffing and augmentation, and onsite evacuation strategies from damage to nearby hazardous facilities, dams, and other nearby sites, in consideration of a security-based event.

PSEG Response to NRC RAI:

PSEG has not selected a reactor technology. As discussed in Section 13.6, *Industrial Security*, of the PSEG Site ESPA SSAR, PSEG will ensure that site characteristics are adequate to support security plans and measures. When a reactor technology selection is made and a combined license (COL) application is prepared, the specific design features to assure site security in compliance with 10 CFR 73.55, will be defined.

Specifically, the PSEG Site COL Application and/or revision to the PSEG Site EPlan will address RAI 13.3(Q-1) through RAI 13.3(Q-5) pursuant to RG 1.206. Additionally, PSEG Site ESPA, Attachment 10, Section 8, *Exercises and Drills*, contains an ITAAC to demonstrate the adequacy of security provisions.

Associated PSEG Site ESP Application Revisions:

No changes to the SSAR or EPlan are required as a result of this RAI response.

Response to RAI No. 22, Question 13.03-22:

In Reference 2, the specific request for Question 13.03-22 was:

SITE-19: ITAAC

Regulatory Basis: 10 CFR 52.80(a)

SRP ACCEPTANCE CRITERIA: Requirement E; Acceptance Criterion 23

[RAI 13.3(S-1)] RG 1.206, Appendix B, Table C.II.1 B1 outlines generic, non-site specific EP-ITAAC Planning Standards, EP Program Elements, Inspection, Tests, Analysis, and Acceptance Criteria. Attachment 10, "EP-ITAAC," does not propose a complete EP-ITAAC addressing the same Planning Standards as Table C.II.1-B1.

Discuss whether these examples of generic EP-ITAAC should be completely addressed in Attachment 10 of the PSEG ESP Emergency Plan with site specific details, or justify why all of the EP-ITAAC in Table C.II.1-B1 are not needed.

PSEG Response to NRC RAI:

Although the PSEG ESP EPlan is separate from the EPlan for SGS and HCGS, similar program elements have been proven acceptable and do not require an EP-ITAAC for the PSEG ESP EPlan.

Enclosure 4 is provided to identify what components within the EP-ITAAC in RG 1.206, Appendix B, Table C.II.1 B1 are not included and why.

Associated PSEG Site ESP Application Revisions:

The PSEG Site EP-ITAAC, as submitted in Attachment 10 to Part 5 of the PSEG Site Early Site Permit Application, will be revised to include the reference to NUREG-0654 Evaluation Criteria [H.9] within EP Program Element 5.1. Enclosure 2 provides the markups of the EPlan to reflect this change.

Note that additional PSEG ESP EPlan ITAACs are revised in response to questions 13.03-9, 13.03-11, and 13.03-14.

Response to RAI No. 22, Question 13.03-23:

In Reference 2, the specific request for Question 13.03-23 was:

Permit Conditions proposed by NRC for Introduction Section of SER
Regulatory Basis: 10 CFR 52.17, 1-0 CFR 52.18, 10 CFR 50.47; Appendix E to 10 CFR 50; Regulatory Guide 1.206,
Acceptance Criteria: 1, 2, 3, 21, 24

The NRC staff has identified the following Permit Conditions and ITAAC for the PSEG ESP regarding the emergency preparedness plan.

- 1. An applicant for a combined license (COL) referencing this early site permit shall contain a fully developed set of EALs for the proposed Unit(s), which are based on in-plant conditions and instrumentation, including onsite and offsite monitoring, and which have been discussed and agreed on by the applicant or licensee and State and local governmental authorities, and shall include the full set of EALs in the COL application.**
- 2. An applicant for a combined license (COL) referencing this early site permit shall identify the location of the TSC and describe the radiological monitoring equipment provided in the TSC.**
- 3. An applicant for a combined license (COL) referencing this early site permit shall identify the location of the OSC and describe the equipment provided in the OSC.**
- 4. The licensee shall perform and satisfy the ITAAC in accordance with 10 CFR 52.17(b)(3).**

PSEG Response to NRC RAI:

PSEG has read, understands, and concurs with the four Permit Conditions proposed by the NRC in Question 13.03-23.

Associated PSEG Site ESP Application Revisions:

No changes to the SSAR or EPlan are required as a result of this RAI response.

PSEG Letter ND-2011-0052, dated July 21, 2011

ENCLOSURE 2

Proposed Revisions

Part 5 – Emergency Plan

Subsection 2.2.1 – The State of Delaware

Subsection 9.5.1 - Emergency Operations Facility - General Description

Subsection 17.5 – Independent Review

**Attachment 10 - Emergency Planning-Inspections, Tests, Analyses, and
Acceptance Criteria (EP-ITAAC)**

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and 2-4 show how these organizations interface with PSEG. Figure 2-5 shows how these organizations interface for protective action decision making.

2.0 Principal Government Jurisdictions in the EPZs

2.1 The State of Delaware

The Delaware Emergency Management Agency (DEMA), Department of Public Safety, has developed the Delaware Radiological Emergency Preparedness (REP) Plan and serves as the lead agency for coordinating state emergency actions as authorized in the Delaware Code Annotated Title 20, Chapter 31.

The Delaware Department of Natural Resources and Environmental Control (DNREC), as authorized by the Delaware Code Annotated Title 7, Chapter 60 is responsible for protecting the environment to include participation in accident assessment, mitigation and recovery efforts in the event of a radiological incident.

The Delaware Department of Health and Social Services (DHSS), as authorized by the Delaware Code Annotated, Title 16, Chapter 1, has the overall responsibility for protecting health and safety of the general public to include accident assessment, social services mitigation and recovery efforts in the event of radiological incident.

The Delaware Department of Agriculture (DDA), as authorized by the Delaware Code Annotated Title 29, Chapter 81, is responsible for protection of agriculture in the interest of health and safety of the public.

The ~~Accident Assessment Advisory Group~~ (TAC) develops Delaware's accident assessment and protective action response. The TAC comprises members of the DNREC, DHSS with the Deputy Director of the Division of Public Health (DPH) and Division of Water Resources (DWR) Senior Science Advisor serving as the Co-Chairperson of the TAC. Protective Action Recommendations are developed and provided to the DEMA Director by the TAC Chairperson.

The resources and response organization of the State of Delaware are described in the Delaware Radiological Emergency Plan. The response organization for the State of Delaware is provided as Figure 2-6. The development of protective actions is performed as outlined in Figure 2-5 and discussed in detail in Sections 10 and 11 of this plan.

2.2 The State of New Jersey

The Office of Emergency Management (OEM) of New Jersey State Police (NJSP) is granted the authority to assist in supervising and coordinating the emergency response activities of the state government and of all of the political subdivisions as outlined in the New Jersey Civil Defense Act of 1942, Chapter 251, as amended.

The New Jersey Department of Environmental Protection (DEP) is empowered by NJ Radiation Accident Response Act (N.J.S.A. 26:2D-37 et.seq.), to take/recommend radiological protective actions as necessary to protect the public health or welfare. The Superintendent of NJSP is the agency head that acts as New Jersey's emergency coordinator responsible for directing and/or coordinating all emergency response by New

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4.2 Operations Support Center (OSC)

In the event of an emergency, operations personnel not on duty and other support personnel report to the OSC to form repair and corrective action teams. Additionally, an OSC Coordinator is designated to coordinate the teams' efforts. The TSC will serve as a backup OSC if required.

4.3 Technical Support Center (TSC)

The TSC meets all habitability requirements outlined in NUREG-0737, Supplement 1. This center supplies technical support to the operations personnel in the Control Room area. The analytical and assessment capabilities assigned to the PSEG Site TSC include:

Safety Parameter Display System (SPDS)
Computerized Dose Assessment
Plant Engineering Support

Documentation available within the TSC supports emergency classification, procedures, and assessments. Document groups include:

Emergency Plans and Procedures
Operating Procedures (Emergency and Normal)
Departmental Support Documents
Technical Specifications
Engineering Support Material
Updated Final Safety Analysis Report
Technical Drawings

4.4 Control Point (CP)

During normal operations, this area serves PSEG Site as the access control point for personnel entering or leaving the Radiological Controlled Area. The radiological protection emergency equipment provided at this location is shown in Table 9-1. Communications equipment is described in Section 7, Emergency Communications.

5.0 Offsite Emergency Facilities and Equipment

5.1 Emergency Operations Facility - General Description

The Emergency Operations Facility (EOF) is controlled and operated by PSEG. It serves as the near site support center to form management of the aggregate response to a radiological emergency as defined by NUREG-0654, Revision 1, and Appendix 1. PSEG commits to operating the EOF so as to fulfill the functional requirements of paragraph 4.1 of NUREG0737, Supplement 1. It should be noted that based on the backup EOF exemption granted for the Salem Generation Station Plan, and the fact that the PSEG Site, Salem and Hope Creek Generating Stations are co-located, the exemption is applicable to all EOF requirements for the PSEG Site.

8.4.1

[RAI 13.03-14 H-3]

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The person requesting the revision, in accordance with appropriate PSEG procedures, should initiate a revision request via the corrective action program.

A list of each section or procedure is maintained in front of the Emergency Plan and Emergency Plan Implementing Procedures indicating the latest revision number and effective date.

3.0 Distribution

All revisions are distributed in accordance with current PSEG procedures.

4.0 Annual Review

The Emergency Plan and associated documents are reviewed at least once each year. As part of the review, the Event Classification Guide is reviewed with the state and local governments. The Emergency Plan and associated documents are updated and procedures are improved, based upon training exercises/drills, and changes onsite or in the environs.

Agreement letters from offsite agencies and local support groups are verified or updated biennially or when changes/revisions to the Plan are implemented which could affect their responsibilities. Updating of telephone numbers is done quarterly and the Manager EP, or designee, coordinates this review.

5.0 Independent Review

The Emergency Plan and associated documents receive an independent review, at least once per 24 months in accordance with current requirements.

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[RAI 13.03-20 P-3]

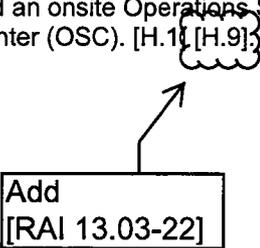
Management directives provide instructions for evaluation and correction of audit findings, training, readiness testing, and emergency equipment. The results of the review and actions taken are forwarded to PSEG senior management. The records of these reviews are retained for five (5) years in accordance with Emergency Preparedness Administrative Procedures and PSEG procedural requirements.

6.0 Maintenance of Documents

The persons holding controlled copies of the Emergency Plan and associated documents are responsible for their maintenance, which consists of promptly incorporating all revisions, additions and deletions, replacing any lost or damaged portions. Replacements for any pages are supplied upon request.

Each such distribution shall be accompanied by instructions for insertion into the document indicating which pages are to be replaced, deleted or added. The distribution shall be mailed to copyholders in accordance with current PSEG procedural requirements. A file of master copies of each revision of the plan is retained either by EP, or on PSEG approved media.

**PSEG Site
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Part 5, Emergency Plan**

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
5.0 Emergency Facilities and Equipment			
<p>10 CFR 50.47(b)(8) – Adequate emergency facilities and equipment to support the emergency response are provided and maintained.</p>	<p>5.1 The licensee has established a Technical Support Center (TSC) and an onsite Operations Support Center (OSC). [H.1] [H.9]</p> <div style="text-align: center; margin-top: 20px;">  <p>Add [RAI 13.03-22]</p> </div>	<p>5.1.1 An inspection of the as-built TSC and OSC will be performed, including a test of the capabilities.</p>	<p>5.1.1 The TSC size is consistent with NUREG-0696. The TSC has at least 1875 ft² of floor space (75 ft² per person for a minimum of 25 persons).</p> <p>5.1.2 Communication equipment is installed in the TSC and OSC, and voice transmission and reception are accomplished.</p> <p>5.1.3 The TSC ventilation system includes a high efficiency particulate air (HEPA), and charcoal filter and radiation monitors are installed.</p> <p>5.1.4 The TSC has the means to receive, store, process, and display plant and environmental information, and enable the initiation of emergency measures and the conduct of emergency assessment. These capabilities are demonstrated during testing and acceptance activities.</p> <p>5.1.5 A reliable and back-up electrical power supply is available for the TSC.</p> <p>5.1.6 There is an OSC located inside the Protected Area.</p>

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Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
5.0 Emergency Facilities and Equipment (cont.)	5.2 The licensee has established an EOF. [H.2]	5.2 An inspection of the EOF will be performed, including a test of the capabilities.	<p>5.2.1 Demonstrated communications between the Control Room, TSC, EOF, field monitoring teams, NRC, responsible State and county agencies, and the ENC/JIC.</p> <p>5.2.2 The parameters referenced in the Emergency Classification and EAL scheme are retrievable in the EOF.</p> <p>5.2.3 Demonstrated the capability of the EOF to handle events at two or more reactors on the site, including the capabilities to discriminate plant data, staffing and operation of the facility.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px; text-align: center;"> Add [RAI 13.03-14 H-11] </div>

**PSEG Site
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Part 5, Emergency Plan**

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
10.0 Emergency Response Support and Resources			
<p>10 CFR 50.47(3) - Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the licensee's near-site Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.</p>	<p>10.1 The licensee has updated the Letters of Agreements with local emergency response organizations before fuel load for the proposed PSEG ESP Site.</p>	<p>10.1 An inspection of the updated Letters of Agreements will be performed.</p>	<p>10.1 The licensee has updated the Memorandum of Understanding with local emergency response organizations prior to the full-participation exercise before fuel load for the proposed PSEG ESP Site.</p>

Add
[RAI 13.03-9 and
13.03-11 B-5]

PSEG Letter ND-2011-0052, dated July 21, 2011

ENCLOSURE 3

Regulatory Requirements Cross Reference Document

ENCLOSURE 3

REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 1	10 CFR 50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities
Part 2	10 CFR 50.47, Emergency Plans
Part 3	NUREG-0654, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants
Part 4	NUREG-0696, Functional Criteria for Emergency Response Facilities
Part 5	10 CFR 50.33, Content of Applications; General Information
Part 6	10 CFR 50.34, Contents of Applications; Technical Information
Part 7	10 CFR 50.54, Conditions of Licenses
Part 8	10 CFR 50.72, Immediate Notification Requirements For Operating Nuclear Power Reactors
Part 9	10 CFR 52.77, Contents of Applications; General Information
Part 10	10 CFR 52.79, Contents of Applications; Technical Information
Part 11	10 CFR 52.80, Contents of Applications; Additional Technical Information
Part 12	10 CFR 100, Reactor Site Criteria
Part 13	NRC Bulletin 2005-02
Part 14	NRC Bulletin 80-15
Part 15	Regulatory Issue Summary 2004-13
Part 16	Generic Letter 91-14
Part 17	Information Notice 85-44

ENCLOSURE 3

REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 1

10 CFR 50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities

REGULATION	STATEMENT	EPLAN	COMMENTS
IV A.	The organization for coping with radiological emergencies shall be described, including definition of authorities, responsibilities, and duties of individuals assigned to the licensee's emergency organization	Sections 1, 2, 3, 4	
IV A.	and the means for notification of such individuals in the event of an emergency.	Section 6	
IV A.1	A description of the normal plant operating organization.	Section 3	
IV A.2.a	A description of the onsite emergency response organization with a detailed discussion of: Authorities, responsibilities, and duties of the individual(s) who will take charge during an emergency;	Sections 2, 3	
IV A.2.b	Plant staff emergency assignments;	Section 3	
IV A.2.c	Authorities, responsibilities, and duties on an onsite emergency coordinator who shall be in charge of the exchange of information with offsite authorities responsible for coordinating and implementing offsite emergency measures.	Section 3	
IV A.3	A description, by position and function to be performed, of the licensee's headquarters personnel who will be sent to the plant site to augment the onsite emergency organization.	Section 3	

ENCLOSURE 3

REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 1

10 CFR 50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities

REGULATION	STATEMENT	EPLAN	COMMENTS
IV A.4	Identification, by position and function to be performed, of persons within the licensee organization who will be responsible for making offsite dose projections, and a description of how these projections will be made and the results transmitted to State and local authorities, NRC, and other appropriate governmental entities.	Sections 3, 6, 10, 11	
IV A.5	Identification, by position and function to be performed, of other employees of the licensee with special qualifications for coping with emergency conditions that may arise. Other persons with special qualifications, such as consultants, who are not employees of the licensee and who may be called upon for assistance for emergencies shall also be identified. The special qualifications of these persons shall be described.	Sections 2, 3, 4, 13 Attachment 3 (MOUs)	
IV A.6	A description of the local offsite services to be provided in support of the licensee's emergency organization.	Sections 2, 3, 4, 13 Attachment 3 (MOUs)	
IV A.7	Identification of, and assistance expected from, appropriate State, local, and Federal agencies with responsibilities for coping with emergencies.	Sections 1, 2, 4, 11, 13 Attachments 2, 3, 4	
IV A.8	Identification of the State and/or local officials responsible for planning for, ordering, and controlling appropriate protective actions, including evacuations when necessary.	Sections 1, 2, 4, 11, 13 Attachments 2, 3	
IV B	The means to be used for determining the magnitude of, and for continually assessing the impact of, the release of radioactive materials shall be described,	Sections 4, 10	

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Part 1

10 CFR 50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities

REGULATION	STATEMENT	EPLAN	COMMENTS
IV B (continued)	including emergency action levels that are to be used as criteria for determining the need for notification and participation of local and State agencies, the Commission, and other Federal agencies,	Section 5 Attachments 5, 10	
IV B (continued)	and the emergency action levels that are to be used for determining when and what type of protective measures should be considered within and outside the site boundary to protect health and safety.	Section 5 Attachment 5	
IV B (continued)	The emergency action levels shall be based on in-plant conditions and instrumentation in addition to onsite and offsite monitoring.	Section 5 Attachment 5	
IV B (continued)	These initial emergency action levels shall be discussed and agreed on by the applicant or licensee and state and local governmental authorities and approved by NRC.	Sections 5, 17 Attachment 5	
IV B (continued)	Therefore, emergency action levels shall also be reviewed with the State and local governmental authorities on an annual basis.	Sections 5, 17 Attachment 5	
IV C	The entire spectrum of emergency conditions that involve the alerting or activating of progressively larger segments of the total emergency organization shall be described.	Sections 5, 6	
IV C (continued)	The communication steps to be taken to alert or activate emergency personnel under each class of emergency shall be described.	Sections 3, 5, 6	

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REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 1

10 CFR 50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities

REGULATION	STATEMENT	EPLAN	COMMENTS
IV C (continued)	Emergency action levels (based not only on onsite and offsite radiation monitoring information but also on readings from a number of sensors that indicate a potential emergency, such as the pressure in containment and the response of the Emergency Core Cooling System) for notification of offsite agencies shall be described.	Section 5 Attachments 5, 10	
IV C (continued)	The existence, but not the details, of a message authentication scheme shall be noted for such agencies.	Section 6	
IV C (continued)	The emergency classes defined shall include: (1) notification of unusual events, (2) alert, (3) site area emergency, and (4) general emergency. These classes are further discussed in NUREG - 0654; FEMA - REP - 1.	Section 5	
IV D.1	Administrative and physical means for notifying local, State, and Federal officials and agencies and agreements reached with these officials and agencies for the prompt notification of the public and for public evacuation or other protective measures, should they become necessary, shall be described. This description shall include identification of the appropriate officials, by title and agency, of the State and local government agencies within the EPZs.	Sections 2, 6, 7, 11 Attachments 2, 3	

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REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 1

10 CFR 50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities

REGULATION	STATEMENT	EPLAN	COMMENTS
IV D.2	Provisions shall be described for yearly dissemination to the public within the plume exposure pathway EPZ of basic emergency planning information, such as the methods and times required for public notification and the protective actions planned if an accident occurs, general information as to the nature and effects of radiation, and a listing of local broadcast stations that will be used for dissemination of information during an emergency. Signs or other measures shall also be used to disseminate to any transient population within the plume exposure pathway EPZ appropriate information that would be helpful if an accident occurs.	Section 8	
IV D.3	A licensee shall have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency.	Sections 5, 6, 7	

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REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 1

10 CFR 50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities

REGULATION	STATEMENT	EPLAN	COMMENTS
IV D.3 (continued)	<p>The design objective of the prompt public notification system shall be to have the capability to essentially complete the initial notification of the public within the plume exposure pathway EPZ within about 15 minutes. The use of this notification capability will range from immediate notification of the public (within 15 minutes of the time that State and local officials are notified that a situation exists requiring urgent action) to the more likely events where there is substantial time available for the State and local governmental officials to make a judgment whether or not to activate the public notification system. Where there is a decision to activate the notification system, the State and local officials will determine whether to activate the entire notification system simultaneously or in a graduated or staged manner. The responsibility for activating such a public notification system shall remain with the appropriate governmental authorities.</p>	Section 6	
IV E.1	<p>Adequate provisions shall be made and described for emergency facilities and equipment, including: Equipment at the site for personnel monitoring;</p>	Sections 9, 11	
IV E.2	<p>Equipment for determining the magnitude of and for continuously assessing the impact of the release of radioactive materials to the environment;</p>	Sections 9, 10	
IV E.3	<p>Facilities and supplies at the site for decontamination of onsite individuals;</p>	Section 12	
IV E.4	<p>Facilities and medical supplies at the site for appropriate emergency first aid treatment;</p>	Section 13	See PSEG response to RAI 13.03-14 [H-4]

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REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 1

10 CFR 50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities

REGULATION	STATEMENT	EPLAN	COMMENTS
IV E.5	Arrangements for the services of physicians and other medical personnel qualified to handle radiation emergencies on-site;	Section 13	
IV E.6	Arrangements for transportation of contaminated injured individuals from the site to specifically identified treatment facilities outside the site boundary;	Section 13 Attachment 3 (MOUs)	
IV E.7	Arrangements for treatment of individuals injured in support of licensed activities on the site at treatment facilities outside the site boundary;	Section 13 Attachment 3 (MOUs)	
IV E.8	A licensee onsite technical support center and a licensee near-site emergency operations facility from which effective direction can be given and effective control can be exercised during an emergency;	Section 9	
IV E.9	At least one onsite and one offsite communications system; each system shall have a backup power source. All communication plans shall have arrangements for emergencies, including titles and alternates for those in charge at both ends of the communication links and the primary and backup means of communication.	Section 7	
IV E.9.a	Where consistent with the function of the governmental agency, these arrangements will include: Provision for communications with contiguous State/local governments within the plume exposure pathway EPZ. Such communications shall be tested monthly.	Sections 7, 15	

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Part 1

10 CFR 50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities

REGULATION	STATEMENT	EPLAN	COMMENTS
IV E.9.b	Provision for communications with Federal emergency response organizations. Such communications systems shall be tested annually.	Sections 7, 15	
IV E.9.c	Provision for communications among the nuclear power reactor control room, the onsite technical support center, and the near-site emergency operations facility; and among the nuclear facility, the principal State and local emergency operations centers, and the field assessment teams. Such communications systems shall be tested annually.	Sections 7, 15	
IV E.9.d	Provisions for communications by the licensee with NRC Headquarters and the appropriate NRC Regional Office Operations Center from the nuclear power reactor control room, the onsite technical support center, and the near-site emergency operations facility. Such communications shall be tested monthly.	Sections 7, 15	
IV F.1.i	<p>The program to provide for: (a) The training of employees and exercising, by periodic drills, of radiation emergency plans to ensure that employees of the licensee are familiar with their specific emergency response duties, and (b) The participation in the training and drills by other persons whose assistance may be needed in the event of a radiation emergency shall be described. This shall include a description of specialized initial training and periodic retraining programs to be provided to each of the following categories of emergency personnel:</p> <p>Directors and/or coordinators of the plant emergency organization;</p>	Sections 15, 16	

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REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 1

10 CFR 50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities

REGULATION	STATEMENT	EPLAN	COMMENTS
IV F.1.ii	Personnel responsible for accident assessment, including control room shift personnel;	Sections 15, 16	
IV F.1.iii	Radiological monitoring teams;	Sections 15, 16	
IV F.1.iv	Fire control teams (fire brigades);	Sections 15, 16	
IV F.1.v	Repair and damage control teams;	Sections 15, 16	
IV F.1.vi	First aid and rescue teams;	Sections 15, 16	
IV F.1.vii	Medical support personnel;	Sections 15, 16	
IV F.1.viii	Licensee's headquarters support personnel;	Sections 15, 16	
IV F.1.ix	Security personnel.	Sections 15, 16	
IV F.1	In addition, a radiological orientation training program shall be made available to local services personnel; e.g., local emergency services/Civil Defense, local law enforcement personnel, local news media persons.	Sections 8, 16	Off-site training will be performed IAW the off-site plans.
IV F.2	The plan shall describe provisions for the conduct of emergency preparedness exercises as follows: Exercises shall test the adequacy of timing and content of implementing procedures and methods, test emergency equipment and communications networks, test the public notification system, and ensure that emergency organization personnel are familiar with their duties.	Section 15	

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REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 1

10 CFR 50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities

REGULATION	STATEMENT	EPLAN	COMMENTS
IV F.2.a	A full participation exercise which tests as much of the licensee, State and local emergency plans as is reasonably achievable without mandatory public participation shall be conducted for each site at which a power reactor is located.	Section 15	
IV F.2.b	Each licensee at each site shall conduct an exercise of its onsite emergency plan every 2 years. The exercise may be included in the full participation biennial exercise required by paragraph 2.c. of this section. In addition, the licensee shall take actions necessary to ensure that adequate emergency response capabilities are maintained during the interval between biennial exercises by conducting drills, including at least one drill involving a combination of some of the principal functional areas of the licensee's onsite emergency response capabilities.	Section 15	
IV F.2.c	Offsite plans for each site shall be exercised biennially with full participation by each offsite authority having a role under the radiological response plan. Where the offsite authority has a role under a radiological response plan for more than one site, it shall fully participate in one exercise every two years and shall, at least, partially participate in other offsite plan exercises in this period.	Section 15	
IV F.2.d	A State should fully participate in the ingestion pathway portion of exercises at least once every six years. In States with more than one site, the State should rotate this participation from site to site.		See PSEG response to RAI 13.03-18 [N-1]

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Part 1

10 CFR 50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities

REGULATION	STATEMENT	EPLAN	COMMENTS
IV F.2.e	Licensees shall enable any State or local Government located within the plume exposure pathway EPZ to participate in the licensee's drills when requested by such State or local Government.	Attachment 2	
IV F.2.f	Remedial exercises will be required if the emergency plan is not satisfactorily tested during the 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. The extent of State and local participation in remedial exercises must be sufficient to show that appropriate corrective measures have been taken regarding the elements of the plan not properly tested in the previous exercises.		See PSEG response to RAI 13.03-18 [N-3]
IV F.2.g	All training, including exercises, shall provide for formal critiques in order to identify weak or deficient areas that need correction. Any weaknesses or deficiencies that are identified shall be corrected.	Sections 15, 16	
IV F.2.h	The participation of State and local governments in an emergency exercise is not required to the extent that the applicant has identified those governments as refusing to participate further in emergency planning activities, pursuant to 10 CFR 50.47(c)(1). In such cases, an exercise shall be held with the applicant or licensee and such governmental entities as elect to participate in the emergency planning process.		Not Applicable

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REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 1

10 CFR 50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities

REGULATION	STATEMENT	EPLAN	COMMENTS
IV G	Provisions to be employed to ensure that the emergency plan, its implementing procedures, and emergency equipment and supplies are maintained up to date shall be described.	Section 17	
IV H	Criteria to be used to determine when, following an accident, reentry of the facility would be appropriate or when operation could be resumed shall be described.	Section 14	

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REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 2 10 CFR 50.47, Emergency Plans

REGULATION	STATEMENT	EPLAN	COMMENTS
(b) 1	The onsite and, except as provided in paragraph (d) of this section, offsite emergency response plans for nuclear power reactors must meet the following standards: Primary responsibilities for emergency response by the nuclear facility licensee and by State and local organizations within the Emergency Planning Zones have been assigned,	Sections 1, 2 Attachments 2, 3	
(b) 1 (continued)	the emergency responsibilities of the various supporting organizations have been specifically established,	Sections 1, 2 Attachments 2, 3	Also see Off-site Radiological Emergency Response Plans
(b) 1 (continued)	and each principal response organization has staff to respond and to augment its initial response on a continuous basis.	Sections 2, 3	Also see Off-site Radiological Emergency Response Plans
(b) 2	On-shift facility licensee responsibilities for emergency response are unambiguously defined,	Sections 2, 3	
(b) 2 (continued)	adequate staffing to provide initial facility accident response in key functional areas is maintained at all times,	Sections 2, 3	
(b) 2 (continued)	timely augmentation of response capabilities is available,	Sections 2, 3, 9	
(b) 2 (continued)	and the interfaces among various onsite response activities and offsite support and response activities are specified.	Sections 2, 3, 11, 13	
(b) 3	Arrangements for requesting and effectively using assistance resources have been made,	Sections 2, 4, 11, 13 Attachments 2, 3	

ENCLOSURE 3

REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 2 10 CFR 50.47, Emergency Plans

REGULATION	STATEMENT	EPLAN	COMMENTS
(b) 3 (continued)	arrangements to accommodate State and local staff at the licensee's near-site Emergency Operations Facility have been made,	Section 9	
(b) 3 (continued)	and other organizations capable of augmenting the planned response have been identified.	Sections 1, 2, 4, 11, 13	
(b) 4	A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee,	Section 5 Attachments 5, 10	
(b) 4 (continued)	and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.	Sections 2, 6	Also see Off-site Radiological Emergency Response Plans
(b) 5	Procedures have been established for notification, by the licensee, of State and local response organizations,	Section 6 Attachment 10	
(b) 5 (continued)	and for notification of emergency personnel by all organizations;	Section 6 Attachment 10	
(b) 5 (continued)	the content of initial and follow up messages to response organizations and the public has been established;	Attachment 10	
(b) 5 (continued)	and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established.	Section 6 Attachment 10	

ENCLOSURE 3

REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 2 10 CFR 50.47, Emergency Plans

REGULATION	STATEMENT	EPLAN	COMMENTS
(b) 6	Provisions exist for prompt communications among principal response organizations to emergency personnel	Section 6 Attachment 10	
(b) 6 (continued)	and to the public.	Section 6 Attachment 10	
(b) 7	Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors),	Section 8	
(b) 7 (continued)	the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance,	Section 8 Attachment 10	
(b) 7 (continued)	and procedures for coordinated dissemination of information to the public are established.	Section 8 Attachment 10	
(b) 8	Adequate emergency facilities and equipment to support the emergency response are provided and maintained.	Section 9 Attachment 10	
(b) 9	Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.	Sections 9, 10 Attachment 10	
(b) 10	A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public.	Section 11 Attachment 10	

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REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

**Part 2
10 CFR 50.47, Emergency Plans**

REGULATION	STATEMENT	EPLAN	COMMENTS
(b) 10 (continued)	In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate.	Section 11	
(b) 10 (continued)	Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place,	Section 11	
(b) 10 (continued)	and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.	Section 11	
(b) 11	Means for controlling radiological exposures, in an emergency, are established for emergency workers.	Section 12	
(b) 11 (continued)	The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides.	Section 12	
(b) 12	Arrangements are made for medical services for contaminated injured individuals.	Section 13	
(b) 13	General plans for recovery and reentry are developed.	Section 14	
(b) 14	Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities,	Section 15 Attachment 10	
(b) 14 (continued)	periodic drills are (will be) conducted to develop and maintain key skills,	Section 15	
(b) 14 (continued)	and deficiencies identified as a result of exercises or drills are (will be) corrected.	Section 15	

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REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

**Part 2
10 CFR 50.47, Emergency Plans**

REGULATION	STATEMENT	EPLAN	COMMENTS
(b) 15	Radiological emergency response training is provided to those who may be called on to assist in an emergency.	Sections 15, 16	
(b) 16	Responsibilities for plan development and review and for distribution of emergency plans are established,	Section 17	
(b) 16 (continued)	and planners are properly trained.	Sections 15, 16	

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REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 3

NUREG-0654, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants

The NUREG-0654 Cross Reference is provided in the PSEG Site ESP Part 5, *Emergency Plan*, Table of Contents.

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REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 4

NUREG-0696, Functional Criteria for Emergency Response Facilities

Emergency Response Facilities designs have not been completed at this time since PSEG has not selected a reactor technology. The designs will be developed in accordance with regulations current at time of development, following the selection of a reactor technology.

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REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 5

10 CFR 50.33, Content of Applications; General Information

REGULATION	STATEMENT	EPLAN	COMMENTS
10 CFR 50.33 (g)	<p>If the application is for an operating license or combined license for a nuclear power reactor, or if the application is for an early site permit and contains plans for coping with emergencies under § 52.17(b)(2)(ii) of this chapter, the applicant shall submit radiological emergency response plans of State and local governmental entities in the United States that are wholly or partially within the plume exposure pathway emergency planning zone (EPZ),⁴ as well as the plans of State governments wholly or partially within the ingestion pathway EPZ.⁵ If the application is for an early site permit that, under 10 CFR 52.17(b)(2)(i), proposes major features of the emergency plans describing the EPZs, then the descriptions of the EPZs must meet the requirements of this paragraph. Generally, the plume exposure pathway EPZ for nuclear power reactors shall consist of an area about 10 miles (16 km) in radius and the ingestion pathway EPZ shall consist of an area about 50 miles (80 km) in radius. The exact size and configuration of the EPZs surrounding a particular nuclear power reactor shall be 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. The size of the EPZs also may be determined on a case-by-case basis for gas-cooled reactors and for reactors with an authorized power level less than 250 MW thermal. The plans for the ingestion pathway shall focus on such actions as are appropriate to protect the food ingestion pathway.</p>		<p>Off-site Radiological Emergency Response Plans were submitted on 5/25/2010 via PSEG letter ND-2010-0075.</p>

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Part 5

10 CFR 50.33, Content of Applications; General Information

REGULATION	STATEMENT	EPLAN	COMMENTS
	<p>⁴ Emergency planning zones (EPZs) are discussed in NUREG-0396, EPA 520/1-78-016, "Planning Basis for the Development of State and Local Government Radiological Emergency Response Plans in Support of Light-Water Nuclear Power Plants," December 1978.</p> <p>⁵ If the State and local emergency response plans have been previously provided to the NRC for inclusion in the facility docket, the applicant need only provide the appropriate reference to meet this requirement.</p>		
10 CFR 50.33 (j)	If the application contains Restricted Data or other defense information, it shall be prepared in such manner that all Restricted Data and other defense information are separated from the unclassified information.		Off-site Radiological Emergency Response Plans were submitted on 5/25/2010 via PSEG letter ND-2010-0075.

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REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 6

10 CFR 50.34, Contents of Applications; Technical Information

REGULATION	STATEMENT	EPLAN	COMMENTS
10 CFR 50.34 (a)	<i>Preliminary safety analysis report.</i> Each application for a construction permit shall include a preliminary safety analysis report. The minimum information ⁵ to be included shall consist of the following:		Defer to COLA
10 CFR 50.34 (a)(10)	A discussion of the applicant's preliminary plans for coping with emergencies. Appendix E sets forth items which shall be included in these plans.		Defer to COLA
10 CFR 50.34 (b)(6)(v)	Plans for coping with emergencies, which shall include the items specified in appendix E		Defer to COLA
10 CFR 50.34 (f)(2)(xxv)	Provide an onsite Technical Support Center, an onsite Operational Support Center, and, for construction permit applications only, a nearsite Emergency Operations Facility. (III.A.1.2).		Defer to COLA

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REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 7
10 CFR 50.54, Conditions of Licenses

REGULATION	STATEMENT	EPLAN	COMMENTS
10 CFR 50.54 (q)	<p>A licensee authorized to possess and/or operate a research reactor or a fuel facility shall follow and maintain in effect emergency plans which meet the requirements in appendix E to this part. The licensee shall retain the emergency plan and each change that decreases the effectiveness of the plan as a record until the Commission terminates the license for the nuclear power reactor. The nuclear power reactor licensee may make changes to these plans without Commission approval only if the changes do not decrease the effectiveness of the plans and the plans, as changed, continue to meet the standards of § 50.47(b) and the requirements of appendix E to this part. The research reactor and/or the fuel facility licensee may make changes to these plans without Commission approval only if these changes do not decrease the effectiveness of the plans and the plans, as changed, continue to meet the requirements of appendix E to this part. This nuclear power reactor, research reactor, or fuel facility licensee shall retain a record of each change to the emergency plan made without prior Commission approval for a period of 3 years from the date of the change. Proposed changes that decrease the effectiveness of the approved emergency plans may not be implemented without application to and approval by the Commission. The licensee shall submit, as specified in § 50.4, a report of each proposed change for approval. If a change is made without approval, the licensee shall submit, as specified in § 50.4, a report of each change within 30 days after the change is made.</p>	Section 17	§50.4 requirements are contained in EPIPs.

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REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

**Part 7
10 CFR 50.54, Conditions of Licenses**

REGULATION	STATEMENT	EPLAN	COMMENTS
10 CFR 50.54 (t)(1)	The licensee shall provide for the development, revision, implementation, and maintenance of its emergency preparedness program. The licensee shall ensure that all program elements are reviewed by persons who have no direct responsibility for the implementation of the emergency preparedness program either:	Section 17	
10 CFR 50.54 (t)(1)(i)	At intervals not to exceed 12 months or,	Section 17	
10 CFR 50.54 (t)(1)(ii)	As necessary, based on an assessment by the licensee against performance indicators, and as soon as reasonably practicable after a change occurs in personnel, procedures, equipment, or facilities that potentially could adversely affect emergency preparedness, but no longer than 12 months after the change. In any case, all elements of the emergency preparedness program must be reviewed at least once every 24 months.	Section 17	
10 CFR 50.54 (t)(1)(ii)(2)	The review must include an evaluation for adequacy of interfaces with State and local governments and of licensee drills, exercises, capabilities, and procedures. The results of the review, along with recommendations for improvements, must be documented, reported to the licensee's corporate and plant management, and retained for a period of 5 years. The part of the review involving the evaluation for adequacy of interface with State and local governments must be available to the appropriate State and local governments.	Section 17	

ENCLOSURE 3

REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 8

10 CFR 50.72, Immediate Notification Requirements For Operating Nuclear Power Reactors

REGULATION	STATEMENT	EPLAN	COMMENTS
10 CFR 50.72 (a)(1)	General requirements.1 (1) Each nuclear power reactor licensee licensed under §§ 50.21(b) or 50.22 holding an operating license under this part or a combined license under part 52 of this chapter after the Commission makes the finding under § 52.103(g), shall notify the NRC Operations Center via the Emergency Notification System of:	Section 6	
10 CFR 50.72 (a)(1)(i)	The declaration of any of the Emergency Classes specified in the licensee's approved Emergency Plan;	Sections 5, 6	
10 CFR 50.72 (a)(2)	If the Emergency Notification System is inoperative, the licensee shall make the required notifications via commercial telephone service, other dedicated telephone system, or any other method which will ensure that a report is made as soon as practical to the NRC Operations Center.	Section 6	
10 CFR 50.72 (a)(3)	The licensee shall notify the NRC immediately after notification of the appropriate State or local agencies and not later than one hour after the time the licensee declares one of the Emergency Classes.	Section 6	
10 CFR 50.72 (a)(4)	The licensee shall activate the Emergency Response Data System (ERDS) ⁴ as soon as possible but not later than one hour after declaring an Emergency Class of alert, site area emergency, or general emergency. The ERDS may also be activated by the licensee during emergency drills or exercises if the licensee's computer system has the capability to transmit the exercise data.	Sections 3, 6, 7, 9	

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Part 8

10 CFR 50.72, Immediate Notification Requirements For Operating Nuclear Power Reactors

REGULATION	STATEMENT	EPLAN	COMMENTS
10 CFR 50.72 (c)(1)	<p><i>Followup notification.</i> With respect to the telephone notifications made under paragraphs (a) and (b) of this section, in addition to making the required initial notification, each licensee, shall during the course of the event:</p> <p>(1) <i>Immediately report</i> (i) any further degradation in the level of safety of the plant or other worsening plant conditions, including those that require the declaration of any of the Emergency Classes, if such a declaration has not been previously made, or (ii) any change from one Emergency Class to another, or (iii) a termination of the Emergency Class.</p>	Section 6	
10 CFR 50.72 (c)(3)	Maintain an open, continuous communication channel with the NRC Operations Center upon request by the NRC.	Section 6	

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REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 9

10 CFR 52.77, Contents of Applications; General Information

REGULATION	STATEMENT	EPLAN	COMMENTS
10 CFR 52.77	The application must contain all of the information required by 10 CFR 50.33.	See Part 5 of this enclosure	

ENCLOSURE 3

REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 10

10 CFR 52.79, Contents of Applications; Technical Information

REGULATION	STATEMENT	EPLAN	COMMENTS
10 CFR 52.79 (a)(21)	<p>The application must contain a final safety analysis report that describes the facility, presents the design bases and the limits on its operation, and presents a safety analysis of the structures, systems, and components of the facility as a whole. The final safety analysis report shall include the following information, at a level of information sufficient to enable the Commission to reach a final conclusion on all safety matters that must be resolved by the Commission before issuance of a combined license:</p> <p>(21) Emergency plans complying with the requirements of § 50.47 of this chapter, and 10 CFR part 50, appendix E;</p>	See Parts 1 and 2 of this enclosure	
10 CFR 52.79 (a)(22)(i)(A)	<p>All emergency plan certifications that have been obtained from the State and local governmental agencies with emergency planning responsibilities must state that:</p> <p>The proposed emergency plans are practicable;</p>	Attachment 2	
10 CFR 52.79 (a)(22)(i)(B)	<p>These agencies are committed to participating in any further development of the plans, including any required field demonstrations; and</p>	Attachment 2	
10 CFR 52.79 (a)(22)(i)(C)	<p>These agencies are committed to executing their responsibilities under the plans in the event of an emergency;</p>	Attachment 2	
10 CFR 52.79 (a)(22)(ii)	<p>If certifications cannot be obtained after sustained, good faith efforts by the applicant, then the application must contain information, including a utility plan, sufficient to show that the proposed plans provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency at the site.</p>	Attachment 2	

ENCLOSURE 3

REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 10

10 CFR 52.79, Contents of Applications; Technical Information

REGULATION	STATEMENT	EPLAN	COMMENTS
10 CFR 52.79 (b)(4)	If the early site permit approves complete and integrated emergency plans, or major features of emergency plans, then the final safety analysis report must include any new or additional information that updates and corrects the information that was provided under § 52.17(b), and discuss whether the new or additional information materially changes the bases for compliance with the applicable requirements. The application must identify changes to the emergency plans or major features of emergency plans that have been incorporated into the proposed facility emergency plans and that constitute or would constitute a decrease in effectiveness under § 50.54(q) of this chapter.		Not Applicable
10 CFR 52.79 (b)(5)	If complete and integrated emergency plans are approved as part of the early site permit, new certifications meeting the requirements of paragraph (a)(22) of this section are not required.		Not Applicable

ENCLOSURE 3

REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

Part 11

10 CFR 52.80, Contents of Applications; Additional Technical Information

REGULATION	STATEMENT	EPLAN	COMMENTS
10 CFR 52.80 (a)	The proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria that are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will be operated in conformity with the combined license, the provisions of the Act, and the Commission's rules and regulations.	Attachment 10	
10 CFR 52.80 (a)(1)	If the application references an early site permit with ITAAC, the early site permit ITAAC must apply to those aspects of the combined license which are approved in the early site permit.	Attachment 10	
10 CFR 52.80 (a)(2)	If the application references a standard design certification, the ITAAC contained in the certified design must apply to those portions of the facility design which are approved in the design certification.	Attachment 10	
10 CFR 52.80 (a)(3)	If the application references an early site permit with ITAAC or a standard design certification or both, the application may include a notification that a required inspection, test, or analysis in the ITAAC has been successfully completed and that the corresponding acceptance criterion has been met. The Federal Register notification required by § 52.85 must indicate that the application includes this notification.		Not Applicable

ENCLOSURE 3

REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

**Part 12
10 CFR 100, Reactor Site Criteria**

REGULATION	STATEMENT	EPLAN	COMMENTS
10 CFR 100.1 (c)	Siting factors and criteria are important in assuring that radiological doses from normal operation and postulated accidents will be acceptably low, that natural phenomena and potential man-made hazards will be appropriately accounted for in the design of the plant, that site characteristics are such that adequate security measures to protect the plant can be developed, and that physical characteristics unique to the proposed site that could pose a significant impediment to the development of emergency plans are identified.	PSEG Site ESP, SSAR Section 13.3.	
10 CFR 100.21 (g)	Physical characteristics unique to the proposed site that could pose a significant impediment to the development of emergency plans must be identified;	PSEG Site ESP, SSAR Section 13.3.	

ENCLOSURE 3

REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

**Part 13
NRC Bulletin 2005-02**

SECTION	STATEMENT	EPLAN	OTHER	COMMENTS
A	Security-based Emergency classification Levels and Emergency Action Levels	Attachment 5		
B	NRC Notifications	See Part 1	Section 6	
C	Onsite Protective Actions	See Part 1	Section 11	
D	Emergency Response Organization Augmentation	See Part 1	Section 3, 9	
E	Drill and Exercise Program	See Part 1	Section 15	

ENCLOSURE 3

REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

**Part 14
NRC Bulletin 80-15**

SECTION	STATEMENT	EPLAN	COMMENTS
BL 80-15	Back-up power for the ENS		See PSEG response to RAI 13.03-13 [F-1]

ENCLOSURE 3

REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

**Part 15
Regulatory Issue Summary 2004-13**

SECTION	STATEMENT	EPLAN	COMMENTS
Regulatory Issue Summary (RIS) 2004-13	Sheltering in the Licensee's Range of Protective Action Recommendations	Section 11	

ENCLOSURE 3

REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

**Part 16
Generic Letter 91-14**

SECTION	STATEMENT	EPLAN	COMMENTS
Generic Letter 91-14	Emergency Communications	Section 7	

ENCLOSURE 3

REGULATORY REQUIREMENTS CROSS REFERENCE DOCUMENT

**Part 17
Information Notice 85-44**

SECTION	STATEMENT	EPLAN	COMMENTS
Information Notice 85-44	Emergency Communication System Monthly Test	Section 15	

PSEG Letter ND-2011-0052, dated July 21, 2011

ENCLOSURE 4

Generic EP-ITAAC Exceptions

ENCLOSURE 4

Generic EP-ITAAC Exceptions

(Note: Numbering within Enclosure is in accordance with Generic EP-ITAAC in RG 1.206, Appendix B, Table C.II.1 B1.)

PLANNING STANDARD	EP PROGRAM ELEMENTS	INSPECTIONS, TESTS, ANALYSES	ACCEPTANCE CRITERIA	RESPONSE	PSEG ESP EPLAN REFERENCE
1.0 Assignment of Responsibility - Organization Control					
	1.1 The staff exists to provide 24-hour per day emergency response and manning of communications links, including continuous operations for a protracted period. [A.1.e, A.4]	1.1 An inspection of the implementing procedures or staffing rosters will be performed.	1.1 The staff exists to provide 24-hour per day emergency response and manning of communications links, including continuous operations for a protracted period. [The COL applicant will identify specific capabilities.]	Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC.	Section 2, <i>Assignment of Responsibility</i>
2.0 Onsite Emergency Organization					
	2.1 The staff exists to provide minimum and augmented on-shift staffing levels, consistent with Table B-1 of NUREG-0654/FEMA-REP-1, Rev. 1. [B.5, B.7]	2.1 An inspection of the implementing procedures or staffing rosters will be performed.	2.1 The staff exists to provide minimum and augmented on-shift staffing levels, consistent with Table B-1 of NUREG-0654/FEMA-REP-1, Rev. 1. [The COL applicant will identify responsibilities and specific capabilities.]	Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC.	Section 3, <i>Emergency Organization</i>
3.0 Emergency Response Support and Resources					
10 CFR 50.47(3) - Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the licensee's near-site Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.				Added Planning Standard to support responses for RAI 13.03-11 [B-5] and 13.03-9.	Attachment 2, <i>Certification Letters</i> and Attachment 3, <i>Memoranda of Understanding</i>
7.0 Public Education and Information					
			7.1 The licensee has provided space, which may be used for a limited number of the news media. [The COL applicant will specify the number of news media to be accommodated.]	Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC.	Section 9, <i>Emergency Facilities and Equipment</i>

ENCLOSURE 4

Generic EP-ITAAC Exceptions

(Note: Numbering within Enclosure is in accordance with Generic EP-ITAAC in RG 1.206, Appendix B, Table C.II.1 B1.)

PLANNING STANDARD	EP PROGRAM ELEMENTS	INSPECTIONS, TESTS, ANALYSES	ACCEPTANCE CRITERIA	RESPONSE	PSEG ESP EPLAN REFERENCE
8.0 Emergency Facilities and Equipment					
	8.1 The licensee has established a TSC and onsite OSC. [The TSC and OSC may be combined at a single location.] [H.1, H.9]			This program element will be revised to include reference to NUREG-0654 Evaluation Criteria [H.9], which was omitted in the PSEG EP-ITAAC.	
			8.1.2 The TSC is close to the control room, and the walking distance from the TSC to the control room does not exceed two minutes. [Advanced communication capabilities may be used to satisfy the two minute travel time.] [The COL applicant will adopt design certification criteria, if applicable, or otherwise specify TSC location.]	This acceptance criteria is not applicable because as stated in the PSEG ESP Emergency Plan, "When activated, the TSC becomes the primary on-site communications center during an emergency. The TSC provides reliable voice communications to the Control Room, OSC, EOF, NRC, and other offsite agencies." Therefore, the TSC will contain the communication capabilities to satisfy the requirement.	Section 9, <i>Emergency Facilities and Equipment</i>
			8.2.1 The EOF working space size is consistent with NUREG-0696, and is large enough for required systems, equipment, records and storage. [The COL applicant will identify EOF size characteristics.]	Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC.	Section 9, <i>Emergency Facilities and Equipment</i>
			8.2.2 The EOF habitability is consistent with Table 2 of NUREG-0696. [The COL applicant will specify the acceptance criteria for EOF habitability.]		Section 9, <i>Emergency Facilities and Equipment</i>
	8.3 The means exists to initiate emergency measures, consistent with Appendix 1 of NUREG-0654/FEMAREP- 1, Rev. 1. [H.5]	8.3 A test will be performed of the capabilities.	8.3 The means exists to initiate emergency measures, consistent with Appendix 1 of NUREG-0654/FEMAREP- 1, Rev. 1. [The COL applicant will identify specific capabilities.]	Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC.	Section 9, <i>Emergency Facilities and Equipment</i>
	8.4 The means exists to acquire data from, or for emergency access to, offsite monitoring and analysis equipment. [H.6]	8.4 A test will be performed of the capabilities.	8.4 The means exists to acquire data from, or for emergency access to, offsite monitoring and analysis equipment. [The COL applicant will identify specific capabilities.]	Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC.	Section 9, <i>Emergency Facilities and Equipment</i>

ENCLOSURE 4

Generic EP-ITAAC Exceptions

(Note: Numbering within Enclosure is in accordance with Generic EP-ITAAC in RG 1.206, Appendix B, Table C.II.1 B1.)

PLANNING STANDARD	EP PROGRAM ELEMENTS	INSPECTIONS, TESTS, ANALYSES	ACCEPTANCE CRITERIA	RESPONSE	PSEG ESP EPLAN REFERENCE
	8.5 The means exists to provide offsite radiological monitoring equipment in the vicinity of the nuclear facility. [H.7]	8.5 A test will be performed of the capabilities.	8.5 The means exists to provide offsite radiological monitoring equipment in the vicinity of the nuclear facility. [The COL applicant will identify specific capabilities.]	Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC.	Section 9, <i>Emergency Facilities and Equipment</i>
	8.6 The means exists to provide meteorological information, consistent with Appendix 2 of NUREG-0654/FEMA-REP-1, Rev. 1. [H.8]	8.6 A test will be performed of the capabilities.	8.6 The means exists to provide meteorological information, consistent with Appendix 2 of NUREG-0654/FEMA-REP-1, Rev. 1. [The COL applicant will identify specific capabilities.]	Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC.	Section 9, <i>Emergency Facilities and Equipment</i>
9.0 Accident Assessment					
			9.1 The means exists to provide initial and continuing radiological assessment throughout the course of an accident. [The COL applicant will identify specific capabilities.]	Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC.	Section 10, <i>Accident Assessment</i>
10.0 Protective Response					
	10.2 The means exist to radiological monitor people evacuated from the site. [J.3]	10.2 A test will be performed of the capabilities.	10.2 The means exist to radiological monitor people evacuated from the site. [The COL applicant will identify specific capabilities.]	Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC.	Section 11, <i>Protective Response</i>
	10.3 The means exists to notify and protect all segments of the transient and resident populations. [J.10]	10.3 A test will be performed of the capabilities.	10.3 The means exists to notify and protect all segments of the transient and resident populations. [The COL applicant will identify specific capabilities.]	Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC. Note that protective actions are made by the states within the plume exposure pathway.	Section 6, <i>Notification Methods - Response Organizations</i> and Section 11, <i>Protective Response</i>
	10.4 The means exists to register and monitor evacuees at relocation centers. [J.12]	10.4 A test will be performed of the capabilities.	10.4 The means exists to register and monitor evacuees at relocation centers. [The COL applicant will identify specific capabilities.]	Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC. Note that protective actions are made by the states within the plume exposure pathway.	Section 11, <i>Protective Response</i>

ENCLOSURE 4

Generic EP-ITAAC Exceptions

(Note: Numbering within Enclosure is in accordance with Generic EP-ITAAC in RG 1.206, Appendix B, Table C.II.1 B1.)

PLANNING STANDARD	EP PROGRAM ELEMENTS	INSPECTIONS, TESTS, ANALYSES	ACCEPTANCE CRITERIA	RESPONSE	PSEG ESP EPLAN REFERENCE
11.0 Radiological Exposure Control					
10 CFR 50.47(b)(11) – Means for controlling radiological exposures, in an emergency, are established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity PAGs.	11.1 The means exists to provide onsite radiation protection. [K.2]	11.1 A test will be performed of the capabilities.	11.1 The means exists to provide onsite radiation protection. [The COL applicant will identify specific provisions.]	Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC.	Section 12, <i>Radiological Exposure Control</i>
	11.2 The means exists to provide 24-hour-per-day capability to determine the doses received by emergency personnel and maintain dose records. [K.3]	11.2 A test will be performed of the capabilities.	11.2 The means exists to provide 24-hour-per-day capability to determine the doses received by emergency personnel and maintain dose records. [The COL applicant will identify specific provisions.]	Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC.	Section 12, <i>Radiological Exposure Control</i>
	11.3 The means exists to decontaminate relocated onsite and emergency personnel, including waste disposal. [K.5.b, K.7]	11.3 A test will be performed of the capabilities.	11.3 The means exists to decontaminate relocated onsite and emergency personnel, including waste disposal. [The COL applicant will identify specific provisions.]	Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC.	Section 12, <i>Radiological Exposure Control</i>
	11.4 The means exists to provide onsite contamination control measures. [K.6]	11.4 A test will be performed of the capabilities.	11.4 The means exists to provide onsite contamination control measures. [The COL applicant will identify specific provisions.]	Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC.	Section 12, <i>Radiological Exposure Control</i>
12.0 Medical and Public Health Support					
10 CFR 50.47(b)(12) – Arrangements are made for medical services for contaminated, injured individuals.	12.1 Arrangements have been implemented for local and backup hospital and medical services having the capability for evaluation of radiation exposure and uptake [L.1]	12.1 A test will be performed of the capabilities.	12.1 Arrangements have been implemented for local and backup hospital and medical services having the capability for evaluation of radiation exposure and uptake. [The COL applicant will identify specific provisions.]	Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC.	Section 13, <i>Medical Support</i>
	12.2 The means exists for onsite first aid capability. [L.2]	12.2 A test will be performed of the capabilities.	12.2 The means exists for onsite first aid capability. [The COL applicant will identify specific provisions.]	Arrangements have already been initiated to support EP Program Elements 12.1 and 12.3.	Section 13, <i>Medical Support</i>
	12.3 Arrangements have been implemented for transporting victims of radiological accidents, including contaminated injured individuals, from the site to offsite medical support facilities. [L.4]	12.3 A test will be performed of the capabilities.	12.3 Arrangements have been implemented for transporting victims of radiological accidents, including contaminated injured individuals, from the site to offsite medical support facilities. [The COL applicant will identify specific provisions.]		Section 13, <i>Medical Support</i>

ENCLOSURE 4

Generic EP-ITAAC Exceptions

(Note: Numbering within Enclosure is in accordance with Generic EP-ITAAC in RG 1.206, Appendix B, Table C.II.1 B1.)

PLANNING STANDARD	EP PROGRAM ELEMENTS	INSPECTIONS, TESTS, ANALYSES	ACCEPTANCE CRITERIA	RESPONSE	PSEG ESP EPLAN REFERENCE
13.0 Recovery and Reentry Planning and Post-Accident Operations					
10 CFR 50.47(b)(13) - General plans for recovery and reentry are developed.				Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC.	Section 14, <i>Recovery and Reentry Planning</i>
15.0 Radiological Emergency Response Training					
10 CFR 50.47(b)(15) – Radiological emergency response training is provided to those who may be called on to assist in an emergency.	15.1 Site-specific emergency response training has been provided for those who may be called upon to provide assistance in the event of an emergency. [O.1]	15.1 An inspection will be performed of the capabilities.	15.1 Site-specific emergency response training has been provided for those who may be called upon to provide assistance in the event of an emergency. [The COL applicant will identify the specific training program.]	Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC.	Section 16, <i>Radiological Emergency Response Training</i>
16.0 Responsibility for the Planning Effort, Development, Periodic Review, and Distribution of Emergency Plans					
10 CFR 50.47(b)(16) – Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.	16.1 The emergency response plans have been forwarded to all organizations and appropriate individuals with responsibility for implementation of the plans. [P.5]	16.1 An inspection of the distribution list will be performed.	16.1 The emergency response plans have been forwarded to all organizations and appropriate individuals with responsibility for implementation of the plans. [The COL applicant will identify specific distribution requirements.]	Although the PSEG Site EPlan is separate from the SGS/HCGS EPlan, similar program elements have been proven acceptable and do not require an ITAAC.	Section 17, <i>Emergency Plan Administration</i> and <i>Emergency Preparedness Administrative Procedures</i>

PSEG Letter ND-2011-0052, dated July 21, 2011

ENCLOSURE 5

Summary of Regulatory Commitments

ENCLOSURE 5

SUMMARY OF REGULATORY COMMITMENTS

The following table identifies commitments made in this document. (Any other actions discussed in the submittal represent intended or planned actions. They are described to the NRC for the NRC's information and are not regulatory commitments.)

COMMITMENT	COMMITTED DATE	COMMITMENT TYPE	
		ONE-TIME ACTION (YES/NO)	PROGRAMMATIC (YES/NO)
PSEG will revise Part 5, Emergency Plan to incorporate the changes in Enclosure 2 in response to NRC RAI No. 22	This revision will be included in the next update of the PSEG Site ESP Application EPlan.	Yes	No
Appropriate 50.54(q) reviews will be performed to ensure the effectiveness of the EPlans are not decreased by the implementation of the PSEG ESP Emergency Plan.	Appropriate 50.54(q) reviews will be performed prior to fuel load.	Yes	No
Appropriate 50.54(p) reviews will be performed to ensure the effectiveness of the Security Plans are not decreased by the operation of a new reactor(s) at the PSEG Site.	Appropriate 50.54(p) reviews will be performed prior to fuel load.	Yes	No