

## **PMTurkeyCOLPEm Resource**

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**From:** Comar, Manny  
**Sent:** Wednesday, November 02, 2011 3:11 PM  
**To:** TurkeyCOL Resource  
**Subject:** FW: L-2011-440 dated 10-31-2011 - Third Response to NRC Request for Additional Information Letter No. 035 (eRAI 5681) Standard Review Plan Section 13.03 - Emergency Planning  
**Attachments:** L-2011-440 Signed 10-31-2011 RAI No 35 Response 3.pdf

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**From:** Madden, George [<mailto:George.Madden@fpl.com>]  
**Sent:** Monday, October 31, 2011 1:44 PM  
**To:** Matthews, David; Misenhimer, David; Maher, William; Comar, Manny; Stewart, Scott; McCree, Victor  
**Subject:** L-2011-440 dated 10-31-2011 - Third Response to NRC Request for Additional Information Letter No. 035 (eRAI 5681) Standard Review Plan Section 13.03 - Emergency Planning

Re: Florida Power & Light Company  
Proposed Turkey Point Units 6 and 7  
Docket Nos. 52-040 and 52-041  
Third Response to NRC Request for Additional Information Letter No. 035  
(eRAI 5681) Standard Review Plan Section 13.03 – Emergency Planning

Reference:

1. NRC Letter to FPL dated August 15, 2011, Request for Additional Information Letter No.035 Related to SRP Section 13.03, Emergency Planning for the Turkey Point Nuclear Plant Units 6 and 7 Combined License Application
2. FPL Letter L-2011-384 to NRC dated September 14, 2011, Initial Response to NRC Request for Additional Information Letter No. 035 (eRAI 5681) Standard Review Plan Section 13.03 – Emergency Planning
3. FPL Letter L-2011-416 to NRC dated September 30, 2011, Second Response to NRC Request for Additional Information Letter No. 035 (eRAI 5681) Standard Review Plan Section 13.03 – Emergency Planning

Florida Power & Light Company (FPL) provides, as attachments to this letter, its initial responses to the Nuclear Regulatory Commission's (NRC) request for additional information (RAI) RAI 13.03-14 (subparts a, b, and c) regarding emergency planning for hostile action considerations provided in the Reference 1. The attachment identifies changes that will be made in a future revision of the Turkey Point Units 6 and 7 Combined License Application (if applicable). This response schedule was provided by Reference 2.

FPL Letter L-2011-384, Reference 2, provided the responses to RAI 13.03-5 (subparts B-1, B-2, and B-3), RAI 13.03-6, RAI 13.03-7 (subparts E-1 and E-2), RAI 13.03-8 (subparts H-1 and H-4), RAI 13.03-9 (subparts J-1, J-2, J-4, and J-5), RAI 13.03-10 (subpart K-1), RAI 13.03-11 (subpart N-1), and RAI 13.03-13 (subpart P-1).

FPL Letter L-2011-416, Reference 3, provided the responses to RAI 13.03-5 (subparts B-4, B-5, B-6, B-7, B-8, B-9, B-10, B-11, and B-12), RAI 13.03-8 (subparts H-2 and H-3), RAI 13.03-9 (subpart J-3),

RAI 13.03-10 (subpart K-2), RAI 13.03-12 (subpart O-1), RAI 13.03-13 (subpart P-2), RAI 13.03-15 (subparts 1, 2, 3, 4, 5, 6, 7, 8, and 9), and RAI 13.03-16 (subparts A, B, and C).

References 2 and 3 provided the schedule of October 31, 2011, for the response to RAI 13.03-14 (subparts a, b, and c) regarding emergency planning for hostile action considerations.

Attachment: FPL Response to NRC RAI No. 13.03-14 (subparts a, b, and c) (eRAI 5681)

v/r

George Madden

NNP Licensing

FPL/ Insight Global

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Email: [George.Madden@FPL.com](mailto:George.Madden@FPL.com)

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**Subject:** FW: L-2011-440 dated 10-31-2011 - Third Response to NRC Request for Additional Information Letter No. 035 (eRAI 5681) Standard Review Plan Section 13.03 - Emergency Planning

**Sent Date:** 11/2/2011 3:11:09 PM

**Received Date:** 11/2/2011 3:11:11 PM

**From:** Comar, Manny

**Created By:** Manny.Comar@nrc.gov

**Recipients:**  
"TurkeyCOL Resource" <TurkeyCOL.Resource@nrc.gov>  
Tracking Status: None

**Post Office:** HQCLSTR01.nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	3586	11/2/2011 3:11:11 PM
L-2011-440 Signed 10-31-2011 RAI No 35 Response 3.pdf		579890

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L-2011-440  
10 CFR 52.3

October 31, 2011

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

Re: Florida Power & Light Company  
Proposed Turkey Point Units 6 and 7  
Docket Nos. 52-040 and 52-041  
Third Response to NRC Request for Additional Information Letter No. 035  
(eRAI 5681) Standard Review Plan Section 13.03 – Emergency Planning

Reference:

1. NRC Letter to FPL dated August 15, 2011, Request for Additional Information Letter No.035 Related to SRP Section 13.03, Emergency Planning for the Turkey Point Nuclear Plant Units 6 and 7 Combined License Application
2. FPL Letter L-2011-384 to NRC dated September 14, 2011, Initial Response to NRC Request for Additional Information Letter No. 035 (eRAI 5681) Standard Review Plan Section 13.03 – Emergency Planning
3. FPL Letter L-2011-416 to NRC dated September 30, 2011, Second Response to NRC Request for Additional Information Letter No. 035 (eRAI 5681) Standard Review Plan Section 13.03 – Emergency Planning

Florida Power & Light Company (FPL) provides, as attachments to this letter, its initial responses to the Nuclear Regulatory Commission's (NRC) request for additional information (RAI) RAI 13.03-14 (subparts a, b, and c) regarding emergency planning for hostile action considerations provided in the Reference 1. The attachment identifies changes that will be made in a future revision of the Turkey Point Units 6 and 7 Combined License Application (if applicable). This response schedule was provided by Reference 2.

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FPL Letter L-2011-416, Reference 3, provided the responses to RAI 13.03-5 (subparts B-4, B-5, B-6, B-7, B-8, B-9, B-10, B-11, and B-12), RAI 13.03-8 (subparts H-2 and H-3), RAI 13.03-9 (subpart J-3), RAI 13.03-10 (subpart K-2), RAI 13.03-12 (subpart O-1), RAI 13.03-13 (subpart P-2), RAI 13.03-15 (subparts 1, 2, 3, 4, 5, 6, 7, 8, and 9), and RAI 13.03-16 (subparts A, B, and C).

Proposed Turkey Point Units 6 and 7  
Docket Nos. 52-040 and 52-041  
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References 2 and 3 provided the schedule of October 31, 2011, for the response to RAI 13.03-14 (subparts a, b, and c) regarding emergency planning for hostile action considerations.

If you have any questions, or need additional information, please contact me at 561-691-7490.

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

Executed on October 31, 2011

Sincerely,

A handwritten signature in blue ink, appearing to read 'W. Maher', is written over a horizontal line.

William Maher  
Senior Licensing Director – New Nuclear Projects

WDM/GRM

Attachment: FPL Response to NRC RAI No. 13.03-14 (subparts a, b, and c) (eRAI 5681)

cc:

PTN 6 & 7 Project Manager, AP1000 Projects Branch 1, USNRC DNRL/NRO  
Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, Turkey Point Plant 3 & 4

**NRC RAI Letter No. PTN-RAI-LTR-035**

**SRP Section: 13.03 – Emergency Planning**

Question from Licensing and Inspection Branch

**NRC RAI Number: 13.03-14 (eRAI 5681)**

**SITE-17: Hostile Action Considerations**

[Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47, Appendix E to 10 CFR 50.47, Appendix E to 10 CFR Part 50; Regulatory Guide 1.206, Section C.I.13.3.1]

- a. Regulatory Guide 1.206 states in Section C.I.13.3, Emergency Planning, that applicants for a combined license should address the Commission Orders issued February 25, 2002, relating to security events. NRC Bulletin 2005-02, Emergency Preparedness and Response Actions for Security-Based Events, provides guidance for identifying alternative facilities to support emergency response organization augmentation during hostile action events. Describe in the Emergency Plan an alternative facility to support rapid response to a hostile action event, or provide a reference to where this information is contained. If this information is not required, explain why. As stated in NRC Bulletin 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 (EOF) is not performing this action
  - Capability for engineering and damage control teams to begin planning mitigative actions (e.g., general drawings and system information)
- b. NRC Bulletin 2005-02 provides guidance for onsite protective measures for site workers during hostile action events. Describe in the Emergency Plan specific provisions to protect onsite emergency responders and personnel during emergencies resulting from hostile action events, or provide a reference to where this information is contained. If this information is not required, explain why. As stated in NRC Bulletin 2005-02, these provisions may include the following:
  - Evacuation of personnel from target buildings (including security personnel)
  - Site evacuation by opening security gates (while continuing to defend)
  - Dispersal of licensed operators
  - Sheltering of personnel in structures away from potential site targets
  - Arrangements for accounting for personnel after the attack
- c. NRC Bulletin 2005-02 provides guidance for the licensee's prompt notification of the NRC during a security event, in order to enable NRC to warn other licensees of a potential security threat, and to inform other Federal agencies pursuant to the National Response Plan. This notification by the licensee should not be construed to imply that immediate notifications to local law enforcement will be adversely affected, or that the required licensee notification to State and local government agencies within 15 minutes after declaring an emergency will be changed. Describe

in the Emergency Plan how the notification to the NRC of a hostile action based event would occur (e.g., immediately after notification of local law enforcement agencies, or within about 15 minutes following its recognition), or provide a reference to where this information is contained. If this information is not required, explain why.

**FPL RESPONSE:**

The staff's information requests and necessary changes to the PTN Emergency Plan have been identified in the following subparts:

- a. FPL has designated the Emergency Operations Facility (EOF) as an alternative facility to support the emergency response organization augmentation during hostile action events. The EOF is located in Miami approximately 26 miles from PTN. The EOF has all requisite communications capabilities with the Control Room and security. The EOF has the capability of contacting the offsite response organizations, as this is the primary function of the EOF when it is activated. Engineering and damage control teams have general drawings and system information (as described in Reference 1) available in the EOF to determine a course of action to support the response at the affected unit(s).

In a future revision of the COLA Emergency Plan a statement will be added to indicate that the EOF also functions as a back-up TSC and back-up OSC staging areas in the event of an emergency that limits access to the site during a hostile action.

- b. FPL will develop implementing procedures to address applicable portions of NRC Bulletin 2005-02 by providing a strategy and direction to protect emergency responders and personnel during a security-based event, including an emergency resulting from a hostile action event.

These implementing procedures will be developed according to COLA Part 10, Emergency Planning ITAAC Table 3.8-1, Section 9, and will provide a strategy and direction in the listed areas. Additionally, specific sections of the COLA provide information related to onsite personnel protection during a hostile event. These COLA sections are referenced below.

- Evacuation of personnel from the target buildings (including security personnel), dispersal of licensed operators, and sheltering of personnel in structures away from the potential site targets are addressed in implementing procedures that include the communication between the Security Shift Supervisor (SSS) and the Emergency Coordinator (EC). Several of these locations are provided in COLA Part 9, Mitigative Strategies Table, Phase 1 (Reference 2).

These locations include the primary assembly area for evacuated and responding plant personnel which are the Security Training Complex/Daycare/PTN School. Alternate assembly areas for evacuated plant personnel are the PTN Primary and Alternate Offsite Assembly Areas, as described in Section 5.2, Assembly Areas, in each Annex of the COLA Emergency Plan.

- Site evacuation will be coordinated per implementing procedures between the EC and the SSS to determine when and if site personnel are to be evacuated safely during a security related event. These procedures will be developed in accordance with COLA Part 10, Emergency Planning ITAAC Table 3.8-1, Section 9.
  - The COLA Emergency Plan, Section J.5, Accountability, describes the accountability process and incorporates decision making during a security event. During a security event, conditions may dictate initiation of protective measures other than personnel evacuation, assembly, and accountability. The Emergency Coordinator (EC) makes decisions regarding appropriate protective measures based on evaluation of site conditions, including input from security. The EC may direct other protective measures if personnel evacuation, assembly, and accountability result in undue hazards to site personnel. Implementing procedures will provide direction to the EC regarding personnel protective actions during the range of anticipated events. These procedures will be developed according to COLA Part 10, Emergency Planning ITAAC Table 3.8-1, Section 9.
- c. FPL will develop implementing procedures in accordance with COLA Part 10, Emergency Planning ITAAC Table 3.8-1, Section 9, to address applicable portions of NRC Bulletin 2005-02 by addressing the notification of the NRC within about 15 minutes after recognition of a security event to ensure that the NRC has the proper information to warn other licensees of a potential security threat and to inform other Federal agencies pursuant to the National Response Framework.

This response is PLANT SPECIFIC.

#### References:

1. FPL Letter L-2011-356 to NRC dated August 29, 2011, Response to NRC Request for Additional Information Letter No. 033 (eRAI 568[1]), Standard Review Plan Section 14.03.10 Emergency Planning – Inspection, Tests, Analyses, and Acceptance Criteria
2. FPL Turkey Point Units 6 & 7 Mitigative Strategies Description and Plan Required by 10 CFR 52.80(d), Revision 1, March 2011

#### ASSOCIATED COLA REVISIONS:

A new bulleted sentence will be added after the last bullet of COLA Part 5, Section H.2 in a future COLA revision, as shown below:

- The EOF has ready access (either through hard copies or electronic media) to plant records, procedures, and emergency plans needed for effective overall management of Turkey Point emergency response resources.
- **The EOF also functions as a back-up TSC and back-up OSC staging areas in the event of an emergency that limits access to the site during a hostile action.**

Proposed Turkey Point Units 6 and 7  
Docket Nos. 52-040 and 52-041  
FPL Response to NRC RAI No. 13.03-14 (subparts a, b, and c) (eRAI 5681)  
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The Recovery Manager may designate an alternate, temporary location for the EOF if a natural disaster or other external events significantly affect the operational capability of the facility.

**ASSOCIATED ENCLOSURES:**

None