



411 Fayetteville Street Mall
Raleigh NC 27602

10 CFR 50.4
10 CFR 50.54(f)

Serial: RA-12-022
May 9, 2012

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324 / RENEWED LICENSE NOS. DPR-71 AND DPR-62

CRYSTAL RIVER UNIT 3 NUCLEAR GENERATING PLANT
DOCKET NO. 50-302 / LICENSE NO. DPR-72

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT NO. 1
DOCKET NO. 50-400 / RENEWED LICENSE NO. NPF-63

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261 / RENEWED LICENSE NO. DPR-23

SUBJECT: CAROLINA POWER & LIGHT COMPANY AND FLORIDA POWER CORPORATION'S 60-DAY RESPONSE TO THE MARCH 12, 2012, REQUEST FOR INFORMATION REGARDING ENCLOSURE 5, RECOMMENDATION 9.3: EMERGENCY PREPAREDNESS

REFERENCE: NRC Letter, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated March 12, 2012

Ladies and Gentlemen:

On March 12, 2012, the NRC staff issued the Reference letter. Enclosure 5, of the Reference letter, contains specific Requested Actions and Requested Information associated with Recommendation 9.3 for Emergency Preparedness programs. In accordance with 10 CFR 50.54(f), addressees were requested to submit a written response to the request for information within 90 days.

The letter states that if an addressee cannot meet the requested response date, then the addressee must provide a response within 60 days of the date of the letter and describe the alternative course of action that it proposes to take, including the basis of the acceptability of the proposed alternative course of action and estimated completion date. After a careful review of the requested actions and information, Carolina Power & Light Company and Florida Power Corporation propose to take the alternative course of action described in Enclosure 1 of this letter. The basis for the alternative course of action is explained in Enclosure 2.

This letter contains new regulatory commitments as specifically identified in Enclosure 1. Any other actions discussed in this document should be considered intended or planned

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actions. They are included for informational purposes but are not considered Regulatory Commitments.

If you have any questions or require additional information, please contact Donna Alexander, Manager, Nuclear Regulatory Affairs, at (919) 546-5357.

I declare under the penalty of perjury that the foregoing is true and correct. Executed on May 9, 2012.

Sincerely,



Garry Miller
Vice President – Nuclear Engineering
Progress Energy, Inc.

DBM

Enclosures:

1. Proposed Alternative Course of Action for Responding to Recommendation 9.3 Information Request
2. Basis for Proposed Alternative Course of Action for Responding to Recommendation 9.3 Information Request

cc: USNRC Region II, Regional Administrator
USNRC Resident Inspector – BSEP, Unit Nos. 1 and 2
USNRC Resident Inspector – CR3
USNRC Resident Inspector – SHNPP, Unit No. 1
USNRC Resident Inspector – HBRSEP, Unit No. 2
F. Saba, NRR Project Manager – BSEP, Unit Nos. 1 and 2; CR3
A. T. Billoch Colón, NRR Project Manager – SHNPP, Unit No. 1; HBRSEP, Unit No. 2

Enclosure 1

**Proposed Alternative Course of Action for
Responding to Recommendation 9.3 Information Request**

for

Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2
Docket Nos. 50-325 and 50-324 / Renewed License Nos. DPR-71 and DPR-62

Crystal River Unit 3 Nuclear Generating Plant (CR3)
Docket No. 50-302 / License No. DPR-72

Shearon Harris Nuclear Power Plant, Unit No. 1 (SHNPP, Unit No. 1)
Docket No. 50-400 / Renewed License No. NPF-63

H. B. Robinson Steam Electric Plant, Unit No. 2 (HBRSEP, Unit No. 2)
Docket No. 50-261 / Renewed License No. DPR-23

Communications			
Request #	Requested Information	Estimated Completion Date	Comments
1	<p>Provide an assessment of the current communications systems and equipment used during an emergency event to identify any enhancements that may be needed to ensure communications are maintained during a large scale natural event meeting the conditions described in the Communications discussion section of Enclosure 5 of the NRC's letter dated March 12, 2012. The assessment should:</p> <ul style="list-style-type: none"> • Identify any planned or potential improvements to existing onsite communications systems and their required normal and/or backup power supplies, • Identify any planned or potential improvements to existing offsite communications systems and their required normal and/or backup power supplies, • Provide a description of any new communications system(s) or technologies that will be deployed based upon the assumed conditions described above, and • Provide a description of how the new and/or improved systems and power supplies will be able to provide for communications during a loss of all AC power 	10/31/12	Regulatory Commitment applicable to all sites.
2	Describe any interim actions that have been taken or are planned to be taken to enhance existing communications systems power supplies until the communications assessment and the resulting actions are complete.	6/11/12	Regulatory Commitment applicable to all sites.

Communications			
Request #	Requested Information	Estimated Completion Date	Comments
3	Provide an implementation schedule of the time needed to conduct and implement the results of the communication assessment. <ul style="list-style-type: none"> • Conduct the communications assessment. • Provide an implementation schedule of the time needed to implement the results of the communications assessment. 	09/28/12 10/31/12	Target date applicable to all sites. Not a Regulatory Commitment Regulatory Commitment applicable to all sites.

Staffing			
Request #	Requested Information	Estimated Completion Date	Comments
1	<p>Provide an assessment of the onsite and augmented staff needed to respond to a large scale natural event meeting the conditions described in the Staffing discussion section of Enclosure 5 of the NRC's letter dated March 12, 2012. This assessment should include a discussion of the onsite and augmented staff available to implement the strategies as discussed in the emergency plan and/or described in plant operating procedures. The following functions are requested to be assessed:</p> <ul style="list-style-type: none"> • How onsite staff will move back-up equipment (e.g., pumps, generators) from alternate onsite storage facilities to repair locations at each reactor as described in the order regarding the Near Term Task Force (NTTF) Recommendation 4.2. It is requested that consideration be given to the major functional areas of NUREG-0654, Table B-1 such as plant operations and assessment of operational aspects, emergency direction and control, notification/communication, radiological accident assessment, and support of operational accident assessment, as appropriate. • New staff or functions identified as a result of the assessment. • Collateral duties (personnel not being prevented from timely performance of their assigned functions). 		

Staffing			
Request #	Requested Information	Estimated Completion Date	Comments
	<p>Provide onsite and augmented staffing assessment considering all requested functions except those related to NTTF Recommendation 4.2. [Phase 1 staffing assessment applicable to multi unit sites only.]</p> <p>Provide onsite and augmented staffing assessment considering functions related to NTTF Recommendation 4.2. [Phase 2 staffing assessment applicable to all sites.]</p>	<p>4/30/2013</p> <p>BSEP Unit Nos. 1 & 2 ~10/28/14</p> <p>CR3 ~12/31/16</p> <p>SHNPP, Unit No. 1 ~12/4/14</p> <p>HBRSEP, Unit No. 2 ~5/27/14</p>	<p>Regulatory Commitment applicable to BSEP Unit Nos. 1 and 2 only.</p> <p>Regulatory Commitment applicable to all sites. (Four months prior to beginning of second refueling cycle following submittal of overall integrated plan required by Order EA-12-049, Section IV.C.1.a or four months prior to December 31, 2016, whichever comes first.)</p> <p>The Estimated Completion Dates for the Phase 2 Staffing Assessments reflect Progress Energy's current forecasts for refueling outages. Should the refueling outage schedules change, these dates may change accordingly.</p> <p>BSEP, Unit No. 2 will determine the date for BSEP, due to having the earliest second refueling cycle.</p>
2	<p>Provide an implementation schedule of the time needed to conduct the onsite and augmented staffing assessment. If any modifications are determined to be appropriate, please include in the schedule the time to implement the changes.</p> <p>1. Conduct the onsite and augmented staffing assessment:</p>		

Staffing			
Request #	Requested Information	Estimated Completion Date	Comments
	<p>a. The onsite and augmented staffing assessment considering all requested functions except those related to NTTF Recommendation 4.2. [Phase 1 staffing assessment applicable to multi unit sites only.]</p> <p>b. The onsite and augmented staffing assessment considering functions related to NTTF Recommendation 4.2. [Phase 2 staffing assessment applicable to all sites.]</p>	03/29/13	Target date applicable to BSEP Unit Nos. 1 & 2 only. Not a Regulatory Commitment.
		<p>BSEP Unit Nos. 1 & 2 ~7/28/14</p> <p>CR3 ~5/31/16</p> <p>SHNPP, Unit No. 1 ~9/4/14</p> <p>HBRSEP, Unit No. 2 ~2/27/14</p>	<p>Target date, not a Regulatory Commitment (Seven months prior to beginning of second refueling cycle following submittal of overall integrated plan required by Order EA-12-049, Section IV.C.1.a or seven months prior to December 31, 2016, whichever comes first.)</p> <p>The Estimated Completion Dates for the Phase 2 Staffing Assessments reflect Progress Energy's current forecasts for refueling outages. Should the refueling outage schedules change, these dates may change accordingly.</p> <p>BSEP, Unit No. 2 will determine the date for BSEP, due to having the earliest second refueling cycle.</p>
	<p>2. A schedule of the time needed to implement changes will be provided as follows:</p> <p>a. Those associated with Phase 1 staffing assessment.</p>	04/30/13	Regulatory Commitment applicable to BSEP Unit Nos. 1 & 2 only.

Staffing			
Request #	Requested Information	Estimated Completion Date	Comments
	b. Those associated with Phase 2 staffing assessment.	BSEP Unit Nos. 1 & 2 ~10/28/14 CR3 ~8/31/16 SHNPP, Unit No. 1 ~12/4/14 HBRSEP, Unit No. 2 ~5/27/14	Regulatory Commitment applicable to all sites. (Four months prior to beginning of second refueling cycle following submittal of overall integrated plan required by Order EA-12-049, Section IV.C.1.a or four months prior to December 31, 2016, whichever comes first.) The Estimated Completion Dates for the Phase 2 Staffing Assessments reflect Progress Energy's current forecasts for refueling outages. Should the refueling outage schedules change, these dates may change accordingly. BSEP, Unit No. 2 will determine the date for BSEP, due to having the earliest second refueling cycle.
3	Identify how the augmented staff would be notified given degraded communications capabilities.	6/11/2012	Regulatory Commitment applicable to all sites.
4	Identify the methods of access (e.g., roadways, navigable bodies of water and dockage, airlift, etc.) to the site that are expected to be available after a widespread large scale natural event.	6/11/2012	Regulatory Commitment applicable to all sites.
5	Identify any interim actions that have been taken or are planned prior to the completion of the staffing assessment.	6/11/2012	Regulatory Commitment applicable to all sites.

Staffing			
Request #	Requested Information	Estimated Completion Date	Comments
6	<p>Identify changes that have been made or will be made to your emergency plan regarding the on-shift or augmented staffing changes necessary to respond to a loss of all AC power, multi-unit event, including any new or revised agreements with offsite resource providers (e.g., staffing, equipment, transportation, etc.).</p> <p>Changes are identified as follows:</p> <ol style="list-style-type: none"> 1. Those associated with the Phase 1 staffing assessment. 2. Those associated with the Phase 2 staffing assessment. 	<p style="text-align: center;">4/30/13</p> <p style="text-align: center;">BSEP Unit Nos. 1 & 2 ~10/28/14</p> <p style="text-align: center;">CR3 ~8/31/16</p> <p style="text-align: center;">SHNPP, Unit No. 1 ~12/4/14</p> <p style="text-align: center;">HBRSEP, Unit No. 2 ~5/27/14</p>	<p>Regulatory Commitment applicable to BSEP Unit Nos. 1 & 2 only.</p> <p>Regulatory Commitment applicable to all sites. (Four months prior to beginning of second refueling cycle following submittal of overall integrated plan required by Order EA-12-049, Section IV.C.1.a or four months prior to December 31, 2016, whichever comes first.)</p> <p>The Estimated Completion Dates for the Phase 2 Staffing Assessments reflect Progress Energy's current forecasts for refueling outages. Should the refueling outage schedules change, these dates may change accordingly.</p> <p>BSEP, Unit No. 2 will determine the date for BSEP, due to having the earliest second refueling cycle.</p>

Enclosure 2

**Basis for Proposed Alternative Course of Action for
Responding to Recommendation 9.3 Information Request**

for

Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2
Docket Nos. 50-325 and 50-324 / Renewed License Nos. DPR-71 and DPR-62

Crystal River Unit 3 Nuclear Generating Plant (CR3)
Docket No. 50-302 / License No. DPR-72

Shearon Harris Nuclear Power Plant, Unit No. 1 (SHNPP, Unit No. 1)
Docket No. 50-400 / Renewed License No. NPF-63

H. B. Robinson Steam Electric Plant, Unit No. 2 (HBRSEP, Unit No. 2)
Docket No. 50-261 / Renewed License No. DPR-23

Communications

There are two separate responses to the information requests related to communications. The alternative timing of responses to requests #1 and #3 proposed in this letter reflects the higher priority placed by the Staff, and approved by the Commission in “*Staff Requirements – SECY-12-0025 – Proposed Orders and Requests For Information In Response To Lessons Learned From Japan’s March 11, 2011, Great Tohoku Earthquake and Tsunami*” (SRM-SECY-12-0025), dated March 9, 2012, upon the completion of licensee actions necessary to comply with the Final EP Rule issued on November 23, 2011 (76 Federal Register 72,560). The proposed timing is warranted as many of the licensee staff resources necessary for performing the assessment activities, associated with Enclosure 5 of the March 12, 2012, 50.54(f) Request For Information, are the same resources involved in implementing the Final EP Rule requirements and maintaining existing EP requirements.

In addition, the estimated completion date assigned to information request #3 will promote alignment between the out-year budgeting/funding of future enhancements, and the development of an accurate and complete enhancement implementation schedule.

Staffing

As presented in Enclosure 1 of this letter, a 2-phase approach will be used to respond to the information requests associated with Staffing. The table below summarizes this approach.

Plant Type	Phase 1 Staffing Assessment (for functions except those related to NTF Recommendation 4.2)	Phase 2 Staffing Assessment (for functions related to NTF Recommendation 4.2)
Single-unit plants	Perform staffing assessment and implement actions as required by recent Final EP Rule using ISG and NEI 10-05.	Perform staffing assessment as requested by 50.54(f) letter using NEI 12-01; provide results per Enclosure 1 of this letter.
Multi-unit plants	Perform staffing assessment and implement actions as required by recent Final EP Rule using ISG and NEI 10-05. Perform staffing assessment as requested by 50.54(f) letter using NEI 12-01 and material from NEI 10-05; provide results per Enclosure 1 of this letter.	Perform staffing assessment as requested by 50.54(f) letter using NEI 12-01; provide results per Enclosure 1 of this letter.

The basis for this approach is discussed below.

- For multi-unit plants (i.e., BSEP, Unit Nos. 1 and 2), the Phase 1 staffing assessment will be performed by March 29, 2013, and submitted to NRC by April 30, 2013. This assessment will consider all requested functions except those related to Fukushima Near-

Term Task Force (NTTF) Recommendation 4.2. An assessment considering functions related to NTTF Recommendation 4.2 will be performed in Phase 2.

The timing of the Phase 1 staffing assessment reflects the higher priority placed by the Staff, and approved by the Commission in SRM-SECY-12-0025, upon the completion of licensee actions necessary to comply with the Final EP Rule issued on November 23, 2011 (76 Federal Register 72,560). In particular, Section IV.A.9 of 10 CFR 50, Appendix E, requires that licensees complete a detailed analysis demonstrating that on-shift personnel assigned emergency plan implementation functions are not assigned responsibilities that would prevent the timely performance of their assigned functions as specified in the emergency plan. As stated in the Final EP Rule, this analysis must be completed by December 24, 2012.

Based on the Carolina Power & Light Company (CP&L) and Florida Power Corporation (FPC) Emergency Response Organization staffing analysis project in support of the Final EP Rulemaking, it is anticipated that a multi-unit staffing analysis, associated with Enclosure 5 of the March 12, 2012, 50.54(f) Request For Information, will require approximately three months to complete and validate. One additional month is allotted for processing of the assessment submittal package.

As requested, an implementation schedule for any modifications that are determined to be appropriate will be included with the Phase 1 staffing assessment.

Single-unit plants do not need to provide a Phase 1 staffing assessment in response to Enclosure 5 of the March 12, 2012, 50.54(f) Request For Information as performance of this activity is governed by the recent Final EP Rule.

- The Phase 2 staffing assessments will be performed by CP&L and FPC and provided to the NRC four months prior to the beginning the earliest second refueling cycle for any unit on that respective site after submittal of the overall integrated plans required by Section IV.C.1.a of NRC *Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events EA-12-049* (Order EA-12-049) or four months prior to December 31, 2016, whichever comes first. This assessment will consider the requested functions related to Fukushima NTTF Recommendation 4.2.

CP&L and FPC will be responding to multiple regulatory actions resulting from the recommendations contained in the Fukushima NTTF Report, as modified in related Commission Papers and Staff Requirements Memoranda. One of these actions, in particular, has the potential to impact emergency response staffing levels. This action is associated with Fukushima NTTF Recommendation 4.2 and subsequently issued as Order EA-12-049. A summary of Order EA-12-049 is provided below.

This Order requires a three-phase approach for mitigating beyond-design-basis external events. The initial phase requires the use of installed equipment and resources to maintain or restore core cooling, containment and spent fuel pool (SFP) cooling. The transition phase requires providing sufficient, portable, onsite equipment and consumables to maintain or restore these functions until they can be

accomplished with resources brought from off site. The final phase requires obtaining sufficient offsite resources to sustain those functions indefinitely.

Additional details on an acceptable approach for complying with Order EA-12-049 will be contained in final Interim Staff Guidance scheduled to be issued by the NRC in August 2012.

In response to Order EA-12-049, CP&L and FPC must develop new strategies for mitigating beyond-design-basis external events. To ensure accurate results, the staffing assessment for response functions related to NTTF Recommendation 4.2 must be based upon the actions delineated in procedures and guidelines developed in response to the Order. Once the site-specific actions associated with the new response strategies are defined (e.g., down to the procedure or guideline step level), then the staffing needed to perform these actions can be assessed.

For CR3; SHNPP, Unit No. 1; and HBRSEP, Unit No. 2, (i.e., single unit sites), an assessment of the staffing for the functions related to NTTF Recommendation 4.2 will be provided by four months prior to beginning of the second refueling cycle (i.e., as used within the context of NRC Order EA-12-049) or by four months prior to December 31, 2016, whichever comes first.

For BSEP, Unit Nos. 1 and 2, (i.e., multi-unit site) an assessment of the staffing for the functions related to NTTF Recommendation 4.2 will be provided by four months prior to the first occurrence of a second refueling cycle at the site (i.e., the first "second refueling cycle" as used within the context of NRC Order EA-12-049). Unit No. 2 will determine the date for BSEP, due to having the earliest second refueling cycle.

As requested, an implementation schedule for any modifications that are determined to be appropriate will be included with the Phase 2 staffing assessment.

The Phase 2 staffing assessment is one component of the overall work plan necessary to implement the requirements of NRC Order EA-12-049. CP&L and FPC, as stated in the Order, "...shall complete full implementation no later than two (2) refueling cycles after submittal of the overall integrated plan, as required in Condition C.1.a, or December 31, 2016, whichever comes first." "Full compliance shall include procedures, guidance, training, and acquisition, staging, or installing of equipment needed for the strategies."