

# UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION III 2443 WARRENVILLE ROAD, SUITE 210 LISLE, IL 60532-4352

June 1, 2012

EA-12-106

Mr. Larry Meyer Site Vice President NextEra Energy Point Beach, LLC 6610 Nuclear Road Two Rivers, WI 54241

#### SUBJECT: POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2 – NRC BASELINE EMERGENCY PREPAREDNESS BIENNIAL EXERCISE INSPECTION REPORT 05000266/2012503 AND 05000301/2012503; PRELIMINARY WHITE FINDING

Dear Mr. Meyer:

On April 20, 2012, the U.S. Nuclear Regulatory Commission (NRC) completed a Baseline Emergency Preparedness Biennial Exercise inspection at your Point Beach Nuclear Plant. The enclosed report documents the inspection findings, which were discussed on April 20, 2012, with you and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

This report documents an NRC-identified finding that has been determined to be preliminarily White, a finding with low to moderate safety significance that may require additional NRC inspections. As described in Section 4OA5 of this report, a finding was identified for failure to comply with 10 CFR 50.54(g)(2). Specifically, on April 18, 2012, during the biennial emergency preparedness exercise, the inspectors identified a logic error in EPIP 1.3, "Dose Assessment and Protective Action Recommendations (PARs)," that directed the emergency director to revisit the guestion of, "Do Known Impediments to Evacuation Exist," after a prior decision to evacuate affected downwind sectors had been implemented by local authorities. In such cases, the EPIP 1.3 Protective Action Recommendations flow chart incorrectly required the emergency director to rescind the evacuation Protective Action Recommendations (PARs) and supersede it with a shelter PAR. In addition, the inspectors identified that EPIP 1.3 did not initiate PARs at 1 rem beyond the 10-mile plume exposure pathway. These program element inadequacies degraded the range of public PARs for implementation during emergencies and is an apparent violation of the requirements in 10 CFR 50.54(g)(2) associated with risk-significant planning standard 10 CFR 50.47(b)(10). This finding was assessed based on the best information available, using the Emergency Preparedness Significance Determination Process (SDP). The final resolution of this finding will be conveyed in separate correspondence.

The finding is also associated with an apparent violation of NRC requirements and is being considered for escalated enforcement action in accordance with the NRC Enforcement Policy, which can be found on the NRC's Web site at <u>http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html</u>.

In accordance with NRC Inspection Manual Chapter (IMC) 0609, we intend to complete our evaluation using the best available information and issue our final determination of safety significance within 90 days of the date of this letter. The SDP encourages an open dialogue between the NRC staff and the licensee; however, the dialogue should not impact the timeliness of the staff's final determination. Before we make a final decision on this matter, we are providing you with an opportunity to: (1) attend a Regulatory Conference where you can present to the NRC your perspective on the facts and assumptions the NRC used to arrive at the finding and assess its significance; or (2) submit your position on the finding to the NRC in writing. If you request a Regulatory Conference, it should be held within 30 days of the receipt of this letter and we encourage you to submit supporting documentation at least 1 week prior to the conference in an effort to make the conference more efficient and effective. If a Regulatory Conference is held, it will be open for public observation. To announce the conference, a public meeting notice and press release will be issued. If you decide to submit only a written response, such submittal should be sent to the NRC within 30 days of your receipt of this letter. If you decline to request a Regulatory Conference or submit a written response, you relinquish your right to appeal the final SDP determination; in that, by not doing either, you fail to meet the appeal requirements stated in the Prerequisite and Limitation Sections of Attachment 2 of IMC 0609. In addition, if you disagree with the cross-cutting aspect assigned to the finding in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the Regional Administrator, Region III, and the NRC Resident Inspector at the Point Beach Nuclear Plant.

Please contact Richard Skokowski at (630) 829-9757 and in writing within 10 days of the date of this letter to notify the NRC of your intended response. If we have not heard from you within 10 days, we will continue with our significance determination and enforcement decision. The final resolution of this matter will be conveyed in separate correspondence.

Since the NRC has not made a final determination in this matter, no Notice of Violation is being issued for this inspection finding at this time. Please be advised that the number and characterization of the apparent violation described in the enclosed inspection report may change as a result of further NRC review.

L. Meyer

-3-

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any), will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <u>http://www.nrc.gov/reading-rm/adams.html</u> (the Public Electronic Reading Room).

Sincerely,

#### /**RA**/

Steven A. Reynolds, Director Division of Reactor Safety

Docket Nos. 50-266 and 50-301 License Nos. DPR-24 and DPR-27

- Enclosure: Inspection Report 05000266/2012503 and 05000301/2012503 w/Attachment: Supplemental Information
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# U.S. NUCLEAR REGULATORY COMMISSION

# **REGION III**

Docket Nos: License Nos:	05000266; 05000301 DPR-24; DPR-27
Report No:	05000266/2012503; 05000301/2012503
Licensee:	NextEra Energy Point Beach, LLC
Facility:	Point Beach Nuclear Plant, Units 1 and 2
Location:	Two Rivers, WI
Dates:	April 16 through 20, 2012
Inspectors:	Robert Jickling, Senior Emergency Preparedness Inspector James Beavers, Emergency Preparedness Inspector Rob Krsek, Senior Resident Inspector Nick Valos, Senior Reactor Analyst
Approved by:	Richard Skokowski, Chief Plant Support Branch Division of Reactor Safety

## SUMMARY OF FINDINGS

IR 05000266/2012503(DRS), 05000301/2012503(DRS); 04/16/2012 – 04/20/2012; Point Beach Nuclear Plant, Units 1 & 2; Baseline Emergency Preparedness Biennial Exercise Inspection.

This report covers a 1 week period of announced baseline inspection by three regional inspectors and one resident inspector. The inspectors identified a finding with a preliminary significance of White and associated apparent violation. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process" (SDP). Cross-cutting aspects were determined using IMC 0310, "Components Within the Cross-Cutting Areas." Findings for which the SDP does not apply may be Green or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

# A. NRC-Identified and Self-Revealed Findings

# **Cornerstone: Emergency Preparedness**

Preliminarily White. An NRC-identified finding with a preliminary low to moderate safety significance and one associated apparent violation of 10 CFR 50.47(b)(10) for failure to develop and put into place guidelines for the choice of protective actions during an emergency that were consistent with Federal guidance. Federal guidance for the choice of protective actions during an emergency is described in EPA-400-R-92-001, and states, in part, that withdrawal of protective actions from areas where they have already been implemented is usually not advisable during the early phase because of the potential for confusion and possibly impede implementation of protective actions which could place the public at additional risk. Additionally, Federal guidance described in NUREG-0654/FEMA-REP-1, Supplement 3, states, in part, licensees should not relax protective actions until the source of the threat is under control. In the case of a known impediment to evacuation, the licensee's emergency implementing procedure, EPIP 1.3, "Dose Assessment and Protective Action Recommendations," incorrectly directed key decision makers to withdraw protective actions to evacuate the public and replace it with a recommendation to shelter the public. After the NRC identified the finding, the licensee immediately revised its emergency implementing procedure to be consistent with Federal guidance.

This finding is more than minor because it affected the Emergency Preparedness Cornerstone objective of implementing adequate measures to protect the health and safety of the public during a radiological emergency, and is associated with the cornerstone attributes of emergency response organization performance and procedure quality. Specifically, the withdrawal of implemented protective actions could cause confusion of offsite authorities and the public. The inspectors evaluated the finding using the SDP and determined this finding screened as preliminarily White. The finding has a cross-cutting aspect in the area of Human Performance, Resources, because the licensee failed to maintain complete, accurate, and up-to-date procedures as early as 2003 when the licensee returned sheltering to its range of protective action recommendation emergency plans and procedures (H.2(c)). (Section 4OA5.1)

## B. <u>Licensee-Identified Violations</u>

No violations were identified.

## **REPORT DETAILS**

#### 1. REACTOR SAFETY

### **Cornerstone: Emergency Preparedness**

- 1EP1 Exercise Evaluation (71114.01)
  - .1 Exercise Evaluation
  - a. Inspection Scope

The inspectors reviewed the April 18, 2012, biennial emergency preparedness exercise's objectives and scenario to ensure that the exercise would acceptably test major elements of the licensee's emergency plan and to determine if the exercise's simulated problems provided an acceptable framework to support demonstration of the licensee's capability to implement its plan. The inspectors also reviewed records of other drills and exercises conducted in 2010, 2011, and 2012, to determine if those drills' scenarios were sufficiently different from the scenario used in the April 18, 2012, exercise.

The inspectors evaluated the licensee's exercise performance, focusing on the risk-significant activities of emergency classification, notification, and protective action decision making, implementation of accident mitigation strategies, and correction of past exercise weaknesses in the following emergency response facilities:

- Control Room Simulator (CRS);
- Technical Support Center (TSC);
- Operations Support Center (OSC); and
- Emergency Operations Facility (EOF).

The inspectors also assessed the licensee's recognition of abnormal plant conditions, transfer of responsibilities between facilities, internal communications, interfaces with offsite officials, readiness of emergency facilities and related equipment, and overall implementation of the licensee's emergency plan.

The inspectors attended post-exercise critiques in the CRS, TSC, OSC, and EOF to evaluate the licensee's initial self-assessment of its exercise performance. The inspectors later met with the licensee's lead exercise evaluators and managers to obtain the licensee's findings and assessments of its exercise participants' performances. These self-assessments were then compared with the inspectors' independent observations and assessments to assess the licensee's ability to adequately critique its exercise performance. Documents reviewed are listed in the Attachment to this report.

This exercise evaluation inspection constituted one sample as defined in Inspection Procedure (IP) 71114.01-05.

## b. Findings

No findings were identified.

## 4. OTHER ACTIVITIES

## **Cornerstone: Emergency Preparedness**

#### 4OA1 Performance Indicator (PI) Verification (71151)

- .1 Drill/Exercise Performance
  - a. Inspection Scope

The inspectors sampled licensee submittals for the Drill/Exercise Performance PI for the period from the third quarter 2011 through fourth quarter 2011. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance contained in the Nuclear Energy Institute (NEI) Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6, were used. The inspectors reviewed the licensee's records associated with the performance indicator to determine if the licensee accurately reported the indicator in accordance with relevant procedures and the NEI guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the PI, assessments of PI opportunities during pre-designated control room simulator training sessions, and performance during other drills. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one drill/exercise performance sample as defined in IP 71151-05.

b. Findings

No findings were identified.

- .2 <u>Emergency Response Organization Drill Participation</u>
- a. Inspection Scope

The inspectors sampled licensee submittals for the Emergency Response Organization (ERO) Drill Participation PI for the period from the third quarter 2011 through fourth quarter 2011. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance contained in the NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6, were used. The inspectors reviewed the licensee's records associated with the PI to determine if the licensee accurately reported the indicator in accordance with relevant procedures and the NEI guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the PI; performance during the 2011 drills; and revisions of the roster of personnel assigned to key emergency response organization positions. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one ERO drill participation sample as defined in IP 71151-05.

b. Findings

No findings were identified.

## .3 Alert and Notification System

#### a. Inspection Scope

The inspectors sampled licensee submittals for the Alert and Notification System (ANS) PI for the period from the third quarter 2011 through fourth quarter 2011. To determine the accuracy of the PI data reported during those periods, PI definitions and guidance contained in the NEI Document 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 6, were used. The inspectors reviewed the licensee's records associated with the PI to determine if the licensee accurately reported the indicator in accordance with relevant procedures and the NEI guidance. Specifically, the inspectors reviewed licensee records and processes including procedural guidance on assessing opportunities for the PI and results of periodic scheduled ANS operability tests. Documents reviewed are listed in the Attachment to this report.

This inspection constituted one alert and notification system sample as defined in IP 71151-05.

b. Findings

No findings were identified.

- 4OA5 Other Activities
  - .1 Protective Action Recommendation Weakness
    - a. Inspection Scope

The inspectors reviewed the circumstances surrounding the April 18, 2012, exercise critique weakness of incorrectly implemented impediments for protective action recommendations (PARs). The inspectors reviewed the licensee's emergency plan implementing procedure EPIP 1.3, "Dose Assessment and PARs," used by the key decision makers during the exercise to make protective action recommendations to the offsite authorities to determine adequacy of the procedure.

b. Findings

Introduction: A finding having a significance of preliminarily White with one apparent violation of 10 CFR 50.54(q)(2) and the planning standards in 10 CFR 50.47(b)(10) was identified by the NRC for failure to develop and have in place guidelines for the choice of protective actions during an emergency that were consistent with Federal guidance. The finding included two examples of a non-compliant element. The non-compliant element impacted the Emergency Preparedness Cornerstone objective of ensuring the licensee is capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency. The first example was a procedure that inappropriately withdrew an existing evacuation PAR. The second example was failing to have an adequate process in place that initiated PARs at 1 rem to state and local authorities for affected populated areas beyond the 10-mile plume exposure emergency planning zone (EPZ) pathway.

Description: During the licensee's 2012 Exercise, an initial PAR was made to the State and local authorities to evacuate 2 miles around and 5 miles downwind based on plant conditions for a General Emergency declaration. The State implemented the evacuation of the public (simulated) as recommended; however, a short time later determined there were impediments to evacuation and notified the Point Beach ERO of the impediments. The ERO, using EPIP 1.3, notified the State and local authorities of a modification to the PARs from evacuation to sheltering 2 miles around the plant and 5 miles downwind. The State contacted the ERO and declined the shelter recommendation and continued the evacuation of the public. The licensee's PAR procedure directed the use of a flowchart to determine PARs for the State and local authorities. After the initial evacuation PAR for a General Emergency declaration, the licensee's PAR procedure continued to monitor plant and radiological conditions and looped continuously through the flowchart. A flowchart decision box guestioned whether known impediments to evacuation existed and, if ves, directed sheltering 2 miles around the plant and 5 miles downwind. The procedure did not follow Federal guidance in EPA-400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Accidents" (EPA-400) which states, in part, withdrawal of protective actions from areas where they have already been implemented is usually not advisable during the early phase because of the potential for changing conditions and confusion. Also, NUREG-0654/ FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants" (NUREG-0654), Supplement 3, states, in part, licensees should not relax protective actions until the source of the threat is under control.

For the second example, the Federal guidance states in part, protective actions, evacuation or sheltering, should normally be initiated at 1 rem (EPA-400, Table 2-1). These protective actions are not limited by distance. The licensee's procedure, EPIP 1.3, had no procedural steps to provide protective action recommendations at 1 rem beyond the 10-mile EPZ, although it did have a statement in the precautions and limitations section that stated "In some unlikely cases, it is possible for a radiological release to exceed the 10-mile EPZ. In such cases, additional PARs could be issued and tracking support provided if the counties so desire." During the licensee's 2012 Exercise, the licensee identified a failure to provide the State and local authorities a PAR beyond the 10-mile EPZ when indications exceeded the Federal guidance, but did not identify the non-compliance in the procedure to provide ad-hoc PARs to the State and local authorities beyond the 10-mile EPZ.

Although the licensee discussed the issue above in its critique, the inspectors determined that the ERO performance was consistent with the procedure. The inspectors concluded the apparent cause of the ERO weakness was likely due to the inadequate provisions in the procedure. Because this issue could have occurred during an actual event, the NRC is treating this issue as a failure to comply with a regulation, specifically, planning standard 10 CFR 50.47(b)(10).

<u>Analysis</u>: The inspectors determined a performance deficiency existed because the licensee failed to meet requirements in planning standard 10 CFR 50.47(b)(10) that requires, in part, guidelines for the choice of protective actions consistent with Federal guidance. The Federal guidance in EPA-400 states, "Withdrawal of protective actions from areas where they have already been implemented is usually not advisable during the early phase because of the potential for changing conditions and confusion." Specifically, the licensee's procedure allowed both withdrawing protective actions

recommendations from areas where they have already been implemented and failing to provide protective action recommendations to the state and local authorities when indications exist that Federal guidance had been exceeded.

This issue was within the licensee's ability to foresee and correct because of commitments in Section 8.0 of the Point Beach Emergency Plan that required Emergency Plan, EPIPs, and Severe Accident Management Guidelines be reviewed on an annual basis and updated as necessary. There was guidance in Regulatory Information Summaries (RISs 2003-12, 2004-13, and 2005-08) that provided clarification of 10 CFR 50.47(b)(10) regulations as well as the Federal guidance found in EPA-400 and NUREG-0654, Supplement 3. This guidance was available before EPIP 1.3 was revised on March 4, 2004, and when it was further revised on July 29, 2005.

The significance of this finding was determined using of Inspection Manual Chapter 0609 Appendix B, "Emergency Preparedness Significance Determination Process (SDP)" and Attachment 2 of MC 0609 Appendix B, "Failure To Comply Significance Logic." The issue was determined to be more than minor because it adversely affected the Emergency Preparedness Cornerstone Objective to ensure that the licensee is capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency and is associated with the cornerstone attribute of procedure quality. Specifically, withdrawal of protective actions from areas where they have already been implemented is usually not advisable because of the potential for changing conditions, confusion, and a lack of confidence, and possibly impede implementation of protective actions which could place the public at additional risk. Also, failing to provide PARs to the state and local authorities when indications exceed Federal guidance could cause confusion and a potential to increase dose to the population at risk in the event of an actual radiological emergency.

The examples in SDP did not compare with the finding; therefore, Attachment 2, "Failure to Comply Significance Logic," was used to determine the significance of this finding. Failure to comply with a risk-significant planning standard (RSPS), 10 CFR 50.47(b)(10), was a degradation of the RSPS function where a program element is not adequate or not compliant, but the risk-significant planning standard function, although degraded, is available for emergency response which resulted in a preliminarily White finding. The second example would be screened as a lesser significance by the EP SDP, therefore we are assigning a preliminarily White significance to the finding based on the first example.

The finding has a cross-cutting aspect in the area of Human Performance, Resources, because the licensee failed to maintain complete, accurate, and up-to-date procedures as early as 2003 when the licensee returned sheltering to its range of protective action recommendation emergency plans and procedures (H.2(c)).

<u>Enforcement</u>: During the inspection, the inspectors identified an apparent violation of NRC requirements. Title 10 CFR 50.54(q)(2) requires licensees to follow and maintain the effectiveness of an emergency plan that meets the requirements in Appendix E to 10 CFR Part 50 and the planning standards of 50.47(b). Title 10 CFR 50.47(b)(10) requires, in part, for licensees to develop and have in place guidelines for the choice of protective actions during an emergency that were consistent with Federal guidance. Federal guidance in, "The Manual of Protective Action Guides and Protective Actions for Nuclear Incidents," EPA 400-R-92-001, states, on page 5-3,

"Withdrawal of protective actions from areas where they have already been implemented is usually not advisable during the early phase because of the potential for changing conditions and confusion." Also, Federal guidance in NUREG-0654, FEMA-REP-1, Revision 1, Supp. 3, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," similarly states licensees should not relax protective actions until the source of the threat is under control.

An apparent violation of 10 CFR 50.54(q)(2) and the planning standards in 10 CFR 50.47(b)(10) was identified by the NRC for failure to develop and have in place guidelines for the choice of protective actions during an emergency that were consistent with Federal guidance. Specifically, the licensee failed to provide guidelines consistent with Federal guidance in its emergency procedures. Specifically, Point Beach Nuclear Plant emergency plan implementing procedure, EPIP 1.3, "Dose Assessment and Protective Action Recommendations," allowed the emergency response organization to make a protective action recommendation (PAR) during an exercise that had the effect of withdrawing an earlier PAR that the local authorities had already started to implement and did not initiate PARs at 1 rem beyond the 10-mile plume exposure pathway and as specified in the emergency plan.

This issue was entered into the licensee's corrective action program as AR 0176848. The finding and associated apparent violation of 10 CFR 50.54(q)(2) and associated planning standard 10 CFR 47(b)(10), is of preliminarily White significance pending completion of the final significance determination (AV 05000266/2012503-01; AV 05000301/2012503-01, Protective Action Recommendation Weakness).

4OA6 Management Meetings

.1 Exit Meeting Summary

On April 20, 2012, the inspectors presented the biennial exercise inspection results to you and other members of licensee staff. The licensee acknowledged the issues presented. The inspectors confirmed that none of the potential report input discussed was considered proprietary.

ATTACHMENT: SUPPLEMENTAL INFORMATION

## SUPPLEMENTAL INFORMATION

# **KEY POINTS OF CONTACT**

#### <u>Licensee</u>

- L. Meyer, Site Vice President
- R. Wright, Plant General Manager
- S. Brown, Engineering Manager
- T. Conboy, Maintenance Manager
- A. Fitzgerald, Emergency Preparedness Specialist
- L. Germann, Senior Emergency Preparedness Coordinator
- R. Harrsch, Operations Manager
- B. Hennessy, Licensing Supervisor
- R. Johnson, Senior Emergency Preparedness Coordinator
- J. Keltner, Chemistry Manager
- D. Lauterbur, Training Manager
- K. Locke, Licensing Engineering Analyst II
- K. Longston, Senior Emergency Preparedness Coordinator
- J. Schleif, Acting Emergency Preparedness Manager
- J. Strharsky, Emergency Preparedness Manager
- R. Welty, Radiation Protection Manager
- P. Wild, Engineering Manager

## Nuclear Regulatory Commission

S. Burton, Senior Resident Inspector

# LIST OF ITEMS OPENED, CLOSED AND DISCUSSED

# <u>Opened</u>

05000266/2012503-01	AV	Protective Action Recommendation Weakness
05000301/2012503-01	AV	Protective Action Recommendation Weakness

<u>Closed</u>

None

Discussed

None

## LIST OF DOCUMENTS REVIEWED

The following is a partial list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspector reviewed the documents in their entirety, but rather that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

### Section 1EP1

- Point Beach Nuclear Plant (PBNP) 2012 Evaluated Exercise, February 17, 2012
- PBNP Drill and Exercise Corrective Action Program Issue Reports; October 2010 - March 2012
- PBNP Drill and Exercise Scenario Timelines; October 2010 March 2012
- EPIP 1.1; Course of Actions; Revision 62
- EPIP 1.2; Emergency Classification; Revision 50
- EPIP 1.2.1; Emergency Action Level Technical Basis; Revision 8
- EPIP 1.3; Dose Assessment and Protective Action Recommendations; Revision 42
- EPIP 2.1; Notifications ERO, State and Counties, and NRC; Revision 45
- EPIP 4.1; Technical Support Center (TSC) Activation and Evacuation; Revision 46
- EPIP 4.2; Operations Support Center (OSC) Activation and Evacuation; Revision 24
- EPIP 4.3; Emergency Operations Facility (EOF) Activation and Evacuation; Revision 38
- EPIP 5.1; Personnel Emergency Dose Authorization; Revision 19
- EPIP 5.2; Radioiodine Blocking and Thyroid Dose Accounting; Revision 16
- EPIP 6.1; Assembly, Accountability, and Evacuation of Personnel; Revision 32
- EPIP 10.2; Core Damage Estimation Unit 1; Revision 1
- AR 01757696; Exercise-Manitowoc County Deficiency for EAS Message; April 21, 2012
- AR 01757178; Exercise-Priority of Input Data for Dose Calculation Methodology; April 20, 2012
- AR 01757147; Exercise-Differences Identified Between NRC and PBNP News Releases; April 19, 2012
- AR 01757019; Exercise-Timeliness of Unusual Event Notification; April 19, 2012
- AR 01756993; Exercise-Timeliness for Dispatching OSC Teams; April 19, 2012
- AR 01756971; Exercise-Exercise RASCAL Issues; April 19, 2012
- AR 01756949; Exercise-Include Arrival Times for Responders in the ERFs; April 19, 2012
- AR 01756944; Exercise-Briefing Expectations for Reentry Teams; April 19, 2012
- AR 01756934; Exercise-Evaluate Process for Radiation Protection Briefings; April 19, 2012
- AR 01756918; Exercise-Identify NRC Counterpart Positions; April 19, 2012
- AR 01756889; Exercise-NRC Request for Manned Open Line in the Control Room; April 19, 2012
- AR 01756867; Exercise-PAGs Greater Than 10 Miles Not Acted On; April 19, 2012
- AR 01756845; Exercise-Incorrectly Implemented Impediments for PAR; April 19, 2012
- AR 01756842; Exercise-Dose Calcs. Delay Resulted in Missed DEP; April 19, 2012
- AR 01756818; Exercise-Dose Assessment Knowledge Issues; April 19, 2012

### Section 40A1

-Monthly Data Elements for NRC Emergency Response Organization (ERO) Drill Participation; September – December 2011

-Monthly Data Elements for NRC Drill/Exercise Performance; July - December 2011

-Drill and Exercise Performance Indicator Records; July - December 2011

-Monthly Data Elements for Alert and Notification System Reliability; July - December 2011

#### Section 40A5

-NextEra Energy Point Beach White Paper 2012 NRC/FEMA Evaluated Exercise; April 17, 2012 -AR 01756848; Exercise-Guidance In EPIP 1.3 Needs Clarification; April 19, 2012

# LIST OF ACRONYMS USED

ADAMS	Agencywide Document Access and Management System
ANS	Alert and Notification System
AR	Action Request
AV	Apparent Violation
CFR	Code of Federal Regulations
CRS	Control Room Simulator
EOF	Emergency Operations Facility
EP	Emergency Preparedness
EPIP	Emergency Plan Implementing Procedures
EPZ	Emergency Planning Zone
ERO	Emergency Response Organization
FEMA	Federal Emergency Management Agency
IMC	Inspection Manual Chapter
IP	Inspection Procedure
NEI	Nuclear Energy Institute
NRC	U.S. Nuclear Regulatory Commission
OSC	Operations Support Center
PAR	Protective Action Recommendation
PARS	Publicly Available Records System
PI	Performance Indicator
RIS	Regulatory Information Summary
RSPS	Risk-Significant Planning Standard
SDP	Significance Determination Process
TSC	Technical Support Center

L. Meyer

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any), will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <a href="http://www.nrc.gov/reading-rm/adams.html">http://www.nrc.gov/reading-rm/adams.html</a> (the Public Electronic Reading Room).

Sincerely,

/**RA**/

Steven A. Reynolds, Director Division of Reactor Safety

Docket Nos. 50-266 and 50-301 License Nos. DPR-24 and DPR-27

Enclosure: Inspection Report 05000266/2012503 and 05000301/2012503 w/Attachment: Supplemental Information

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Letter to Larry Meyer from Steven A. Reynolds dated June 1, 2012.

SUBJECT: POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2 – NRC BASELINE EMERGENCY PREPAREDNESS BIENNIAL EXERCISE INSPECTION REPORT 05000266/2012503 AND 05000301/2012503; PRELIMINARY WHITE FINDING

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