# ATTACHMENT 10

## Emergency Planning-Inspections, Tests, Analyses, and Acceptance Criteria (EP-ITAAC)

| Planning Standard | EP Program Elements | Inspections, Tests, Analyses | Acceptance Criteria |
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| **1.0 Emergency Classification System** | | | |
| 10 CFR 50.47(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, and state and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial off-site response measures. | 1.1 A standard emergency classification and emergency action level (EAL) scheme exists, and identifies facility system and effluent parameters constituting the bases for the classification scheme. [D.1**]<br><br>[D.1** corresponds to NUREG-0654/FEMA-REP-1 evaluation criteria.] | 1.1.1 An inspection of the Control Room, Technical Support Center (TSC), and Emergency Operations Facility (EOF) will be performed to verify that they have displays for retrieving facility system and effluent parameters as specified in the Emergency Classification and EAL scheme, and the displays are functional.<br><br>1.1.2 An analysis of the EAL technical bases will be performed to verify as-built, site-specific implementation of the EAL scheme. | 1.1.1(a) The parameters referenced in the Emergency Classification and EAL scheme are retrievable in the Control Room, TSC and EOF.<br><br>1.1.1(b) The ranges of the displays encompass the values specified in the Emergency Classification and EAL scheme.<br><br>1.1.2 The EAL scheme is consistent with Regulatory Guide 1.101, Emergency Planning and Preparedness for Nuclear Power Reactors. |

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| **2.0 Notification Methods and Procedures** | | | |
| 10 CFR 50.47(b)(5) – Procedures have been established for notification, by the licensee, of state and local response organizations and for notification of emergency personnel by all organizations; the content of initial and follow-up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established. | 2.1 The means exist to notify responsible state and local organizations within 15 minutes after the licensee declares an emergency. [E.1] | 2.1 A test will be performed to demonstrate the capabilities for providing initial notification to the off-site authorities after a simulated emergency classification. | 2.1 The States of Delaware and New Jersey, and Kent, New Castle, Cumberland, and Salem counties received notification within 15 minutes after the declaration of an emergency from the Control Room, TSC and EOF. |
| | 2.2 The means exist to notify emergency response personnel. [E.2] | 2.2 A test of the primary and back-up ERO notification systems will be performed. | 2.2 A test of the primary and back-up ERO notification system resulted in:<br>a. ERO personnel received the notification message.<br>b. Mobilization communication validated by personnel response to the notification system or by telephone.<br>c. Response to electronic notification and plant public address system demonstrated during normal working hours, and off hours. |
| | 2.3 The means exist to notify and provide instructions to the populace within the plume exposure EPZ. [E.6] | 2.3 A full test of the Prompt Alerting and Notification System (ANS) and the Emergency Alert System (EAS) capabilities will be conducted. | 2.3 Notification and clear instructions to the public accomplished in accordance with the emergency plan requirements. |

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| **3.0 Emergency Communications** | | | |
| 10 CFR 50.47(b)(6) – Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public. | 3.1 The means exist for communications among the Control Room, TSC, EOF, principal state and local emergency operations centers (EOCs), and field monitoring teams. [F.1.d] | 3.1(a) A test will be performed to demonstrate (both primary and secondary methods/systems) the ability to communicate from the Control Room, TSC and the EOF to responsible State and local government agencies. | 3.1(a) Demonstrated (both primary and secondary methods/systems) the ability to communicate from the Control Room, TSC and the EOF to responsible State and local government agencies. |
| | | 3.1(b) A test will be performed to demonstrate (both primary and secondary methods/systems) the ability to communicate from the TSC and the EOF to PSEG field monitoring teams. | 3.1(b) Demonstrated (both primary and secondary methods/systems) the ability to communicate from the TSC and the EOF to PSEG field monitoring teams. |
| | 3.2 The means exist for communications from the Control Room, TSC, and EOF to the NRC headquarters and regional office EOCs (including establishment of the Emergency Response Data System (ERDS) [or its successor system] between the on-site computer system and the NRC Operations Center.) [F.1.f] | 3.2 A test will be performed to demonstrate the ability to communicate from the Control Room, TSC and the EOF to the NRC Operations Centers utilizing the ENS. The Health Physics Network (HPN) is tested to ensure communications between the TSC and EOF with the NRC Operations Centers. ERDS is established [or its successor system] between the on-site computer systems and the NRC Operations Centers. | 3.2 Communications established between the Control Room, TSC and EOF to the NRC headquarters and regional office EOCs utilizing the ENS. The TSC and EOF demonstrated communications with the NRC Operations Center using the HPN. The access port for ERDS [or its successor system] is provided and successfully completes a transfer of data from the Unit to the NRC Operations Center. |

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| **4.0 Public Education and Information** | | | |
| 10 CFR 50.47(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), 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, and procedures for coordinated dissemination of information to the public are established. | 4.1 The licensee has provided space which may be used for a limited number of the news media. [G.3.b] | 4.1 An inspection of the as-built facility/area provided for the news media will be performed in the Emergency News Center/Joint Information Center (ENC/JIC). The space provides adequate equipment to support ENC/JIC operation. | 4.1 The ENC/JIC included equipment to support ENC/JIC operations, including communications with:<br>a. TSC and EOF<br>b. Principal state and local EOCs<br>c. Limited number of news media<br>Designated space is available for news media briefings. |

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| **5.0 Emergency Facilities and Equipment** | | | |
| 10 CFR 50.47(b)(8) – Adequate emergency facilities and equipment to support the emergency response are provided and maintained. | 5.1 The licensee has established a Technical Support Center (TSC) and an onsite Operations Support Center (OSC). [H.1] [H.9]. | 5.1.1 An inspection of the as-built TSC and OSC will be performed, including a test of the capabilities. | 5.1.1 The TSC size is consistent with NUREG-0696. The TSC has at least 1875 $ft^2$ of floor space (75 $ft^2$ per person for a minimum of 25 persons).<br><br>5.1.2 Communication equipment is installed in the TSC and OSC, and voice transmission and reception are accomplished.<br><br>5.1.3 The TSC ventilation system includes a high efficiency particulate air (HEPA), and charcoal filter and radiation monitors are installed.<br><br>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.<br><br>5.1.5 A reliable and back-up electrical power supply is available for the TSC.<br><br>5.1.6 There is an OSC located inside the Protected Area. |

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| **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. | 5.2.1 Demonstrated communications between the Control Room, TSC, EOF, field monitoring teams, NRC, responsible State and county agencies, and the ENC/JIC.<br><br>5.2.2 The parameters referenced in the Emergency Classification and EAL scheme are retrievable in the EOF.<br><br>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. |

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| **6.0 Accident Assessment** | | | |
| 10 CFR 50.47(b)(9) – Adequate methods, systems, and equipment for assessing and monitoring actual or potential off-site consequences of a radiological emergency condition are in use. | 6.1 The means exist to provide initial and continuing radiological assessment throughout the course of an accident. [I.2] | 6.1 A test of the emergency plan will be conducted by performing a drill or exercise to verify the capability to perform accident assessment. | 6.1 Using selected monitoring parameters specified in the PSEG Site Emergency Plan, including EALs (ITAAC Acceptance Criteria 1.1.1), simulated degraded plant conditions are assessed and protective actions are initiated in accordance with the following criteria:<br><br>a. Demonstrated the ability to obtain onsite radiological surveys and samples.<br><br>b. Demonstrated the ability to continuously monitor and control radiation exposure to emergency workers.<br><br>c. Demonstrated the ability to assemble and deploy field monitoring teams within 60 minutes from the decision to do so.<br><br>d. Demonstrated the ability to satisfactorily collect and disseminate field team data.<br><br>e. Demonstrated the ability to develop dose projections. |

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| **6.0 Accident Assessment (cont.)** | | | |
| | | | f. Demonstrated the ability to make the decision whether to issue radioprotective drugs, (KI), to on-site emergency workers.<br><br>g. Demonstrated the ability to develop appropriate protective action recommendations (PARs) and expeditiously notify appropriate authorities within 15 minutes of development. |
| | 6.2 The means exist to determine the source term of releases of radioactive material within plant systems, and the magnitude of the release of radioactive materials based on plant system parameters and effluent monitors. [I.3] | 6.2 A test will be performed to demonstrate that the means exist to determine the source term of releases of radioactive material within plant systems, and the magnitude of the release of radioactive materials based on plant system parameters and effluent monitors. | 6.2 Demonstrated through training or drills that Emergency Plan Implementing Procedures (EPIPs) provide direction to accurately calculate the source terms and the magnitude of the release of postulated accident scenario releases. |
| | 6.3 The means exist to continuously assess the impact of the release of radioactive materials to the environment, accounting for the relationship between effluent monitor readings, and on-site and off-site exposures and contamination for various meteorological conditions. [I.4] | 6.3 A test will be performed that provides evidence that the impact of a radiological release to the environment can be assessed by using the relationship between effluent monitor readings, and on-site and off-site exposures and contamination for various meteorological conditions. | 6.3 Demonstrated through training or drills that the means exist to continuously assess the impact of the release of radioactive materials to the environment, accounting for the relationship between effluent monitor readings, and on-site and off-site exposures and contamination for various meteorological conditions. |

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| **6.0 Accident Assessment (cont.)** | | | |
| | 6.4 The means exist to acquire and evaluate meteorological information. [I.5] | 6.4 A test will be performed to acquire and evaluate meteorological data/information. | 6.4 Demonstrated that meteorological data necessary to implement the EPIPs is retrievable in the Control Room, TSC and EOF. |
| | 6.5 The means exist to determine the release rate and projected doses if the instrumentation used for assessment is off-scale or inoperable. [I.6] | 6.5 A test will be performed of the capabilities to determine the release rate and projected doses if the instrumentation used for assessment is off-scale or inoperable. | 6.5 Demonstrated through training or drills the ability to determine release rate and projected dose rates when instruments are off-scale or inoperable. |
| | 6.6 The means exist for environmental monitoring within the plume exposure EPZ. [I.7] | 6.6 A test will be performed of the capabilities for field monitoring within the plume exposure EPZ. | 6.6 Demonstrated through training or drills the field monitoring teams were dispatched and able to locate and monitor a radiological release within the plume exposure EPZ. |

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| **6.0 Accident Assessment (cont.)** | | | |
| | 6.7 The means exist to make rapid assessments of actual or potential magnitude and locations of radiological hazards through liquid or gaseous release pathways, including activation, notification means, field team composition, transportation, communication, monitoring equipment, and estimated deployment times. [I.8] | 6.7 A test will be performed of the capabilities to make rapid assessments of actual or potential magnitude and locations of radiological hazards through liquid or gaseous release pathways, including activation, notification means, field team composition, transportation, communication, monitoring equipment, and estimated deployment times. | 6.7 Demonstrated through training or drills using EPIPs:<br><br>a. A qualified field monitoring team was promptly notified, activated, briefed and dispatched from the EOF during a radiological release scenario.<br><br>b. The team used monitoring equipment, transportation, communication from the field and located specific sampling locations.<br><br>c. The team made rapid assessment of actual or potential magnitude and locations of any radiological hazards from simulated liquid or gaseous releases. |

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| **6.0 Accident Assessment (cont.)** | | | |
| | 6.8 The capability exists to detect and measure radioiodine concentrations in air in the plume exposure EPZ, as low as $10^{-7}$ µCi/cc (microcuries per cubic centimeter) under field conditions. [I.9] | 6.8 A test will be performed of the capabilities to detect and measure radioiodine concentrations in air in the plume exposure EPZ, as low as $10^{-7}$ µCi/cc (micro-curies per cubic centimeter) under field conditions. | 6.8 A field monitoring team demonstrated the use of sampling and detection equipment for air concentrations in the plume exposure EPZ, as low as $10^{-7}$ µCi/cc. |
| | 6.9 The means exist to estimate integrated dose from the projected and actual dose rates, and for comparing these estimates with the EPA protective action guides (PAGs). [I.10] | 6.9 A test will be performed of the capabilities to estimate integrated dose from the projected and actual dose rates, and for comparing these estimates with the EPA protective action guides. | 6.9 Personnel demonstrated the ability to estimate integrated dose from the dose assessment program and the field monitoring team reading during a radioactive release scenario. The results were successfully compared with the EPA Protective Action Guides (PAGs). |

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| **7.0 Protective Response** | | | |
| 10 CFR 50.47(b)(10) – A range of protective actions has been developed for the plume exposure EPZ for emergency workers and the public. 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. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure EPZ appropriate to the locale have been developed. | 7.1 The means exist to warn and advise on-site individuals of an emergency, including those in areas controlled by the operator, including:[J.1]<br><br>1. Employees not having emergency assignments.<br>2. Visitors.<br>3. Contractor and construction personnel.<br>4. Other people who may be in the public access areas, on or passing through the site, or within the owner controlled area. | 7.1 A test will be performed of the capabilities to warn and advise on-site individuals of an emergency, including those in the owner controlled area and the immediate vicinity. | 7.1 Demonstrated the ability to warn and advise on-site individuals including:<br><br>1. Non-essential employees.<br>2. Visitors.<br>3. Contractor and construction personnel.<br>4. Other people within the owner controlled area and the immediate vicinity. |

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| **8.0 Exercises and Drills** | | | |
| 10 CFR 50.47(b)(14) – Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected. | 8.1 Licensee conducts a full participation exercise to evaluate major portions of emergency response capabilities, which includes participation by each state and local agency within the plume exposure EPZ, and each state within the ingestion control EPZ. [N.1] | 8.1 A full participation exercise (test) will be conducted within the specified time periods of Appendix E to 10 CFR, Part 50. | 8.1.1 The exercise is completed within the specified time periods of 10 CFR Part 50, Appendix E; on-site exercise objectives have been met, and there are no uncorrected on-site exercise deficiencies.<br><br>*A. Accident Assessment and Classification*<br><br>1. Demonstrated the ability to identify initiating conditions, determine emergency action level (EAL) parameters, and correctly classify the emergency throughout the exercise.<br><br>Standard Criteria:<br>a. Determined the correct highest emergency classification level based on events which were in progress, considering past events and their impact on the current conditions, within 15 minutes from the time the initiating condition(s) or EAL is identified. |

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| **8.0 Exercises and Drills (cont.)** | | | |
| | | | *B. Notifications*<br><br>1. Demonstrated the ability to alert, notify and mobilize site emergency response personnel.<br><br>Standard Criteria:<br>a. Completed the designated checklist and performed the plant page announcement of the emergency classification.<br>b. Activated the emergency outdial system within about 10 minutes of the initial event classification for an Alert or higher.<br><br>2. Demonstrated the ability to notify responsible State agencies within 15 minutes and the NRC within 60 minutes after declaring an emergency.<br><br>Standard Criteria:<br>a. Transmitted information using the designated checklist in accordance with approved Emergency Plan documents within 15 minutes of event classification. |

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| **8.0 Exercises and Drills (cont.)** | | | |
| | | | b. Transmitted follow-up notification information using the designated checklist in accordance with approved Emergency Plan documents.<br>c. Transmitted information using designated checklist within 60 minutes of event classification to the NRC.<br><br>3. Demonstrated the ability to warn or advise on-site individuals of emergency conditions.<br><br>Standard Criteria:<br>a. Initiated notification of on-site individuals (via public address, OCA sirens or telephone) using designated checklist.<br><br>4. Demonstrated the capability of the Prompt Alerting and Notification System (ANS) to operate properly for public notification when required. |

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| **8.0 Exercises and Drills (cont.)** | | | |
| | | | Standard Criteria:<br>a. ≥ 90% of the sirens operate properly as indicated by the siren feedback system.<br><br>*C. Emergency Response*<br><br>1. Demonstrated the capability to direct and control emergency operations.<br><br>Standard Criteria:<br>a. Overall Emergency Command and Control demonstrated in the Control room (simulator) in the early phase of the emergency and by the TSC within 90 minutes from initial event classification of Alert or higher.<br><br>2. Demonstrated the ability to transfer the Emergency Coordinator function from the SM in the Control room (simulator) to the EDO in the TSC and later to the ERM in the EOF. |

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| **8.0 Exercises and Drills (cont.)** | | | |
| | | | Standard Criteria:<br>a. Briefings were conducted prior to turnover responsibility. Personnel documented transfer of duties.<br><br>3. Demonstrated the ability to prepare for 24-hour staffing requirements.<br><br>Standard Criteria:<br>a. Completed 24-hour staff assignments.<br><br>4. Demonstrated the ability to perform assembly and accountability for all personnel in the Protected Area (PA) within 30 minutes of an emergency (after accountability message has been announced) requiring Protected Area accountability. |

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| **8.0 Exercises and Drills (cont.)** | | | |
| | | | Standard Criteria:<br>a. Protected Area (PA) personnel accountability completed within 30 minutes of an emergency (after accountability message has been announced) requiring PA accountability.<br><br>*D. Emergency Response Facilities*<br><br>1. Demonstrated activation of the Operations Support Center (OSC) and full functional operation of the TSC and EOF within 90 minutes of event classification.<br><br>Standard Criteria:<br>a. The TSC, and OSC activated within 90 minutes of the initial classification of an Alert or higher.<br>b. The EOF activated within 90 minutes of the initial classification of SAE or higher. |

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| **8.0 Exercises and Drills (cont.)** | | | |
| | | | 2. Demonstrated the adequacy of equipment, security provisions, and habitability precautions for the TSC, OSC, EOF and ENC/JIC, as appropriate.<br><br>Standard Criteria:<br>a. Demonstrated the adequacy of the emergency equipment in the emergency response facilities including availability and general consistency with the Emergency Plan Implementing Procedures (EPIPs).<br>b. Personnel assigned to the ERO implemented and followed applicable EPIPs.<br>c. The SRPT (onshift), Radiological Assessment Coordinator (TSC), and Radiological Support Manager (EOF) implemented the designated checklist if an on-site/off-site release occurred. |

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| **8.0 Exercises and Drills (cont.)** | | | |
| | | | 3. Demonstrated the adequacy of communications for all emergency support resources.<br><br>Standard Criteria:<br>a. Emergency response communications listed in the EPIPs are available and operational.<br>b. Communications systems are tested in accordance with the TSC, OSC and EOF activation checklists.<br>c. Emergency response facility personnel are able to operate all specified communications systems.<br>d. Clear primary and backup communications links are established and maintained for the duration of the exercise.<br><br>*E. Radiological Assessment and Control*<br><br>1. Demonstrated the ability to obtain on-site radiological surveys and samples. |

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| **8.0 Exercises and Drills (cont.)** | | | |
| | | | Standard Criteria:<br>a. Radiation Protection Technicians demonstrated the ability to obtain appropriate instruments (range and type) and perform surveys.<br><br>b. Airborne samples taken when the conditions indicate the need for the information.<br><br>2. Demonstrated the ability to continuously monitor and control radiation exposure to emergency workers.<br><br>Standard Criteria:<br>a. Emergency workers issued self-reading dosimeters when radiation levels require, and exposures controlled to 10 CFR 20 limits (unless the SM or Emergency Duty Officer, or designee, authorizes emergency limits). |

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| **8.0 Exercises and Drills (cont.)** | | | |
| | | | b. Exposure records are available from the site database(primary), a pc database (backup) or a hard copy report(backup)<br><br>3. Demonstrated the ability to assemble and dispatch field monitoring teams.<br><br>Standard Criteria:<br>a. An on-site Field Monitoring Team is ready to be deployed within 60 minutes of being requested from the declaration of an Alert or higher.<br><br>4. Demonstrated the ability to satisfactorily collect and disseminate field team data.<br><br>Standard Criteria:<br>a. Field team data to be collected is dose rate or counts per minute (cpm) from the plume, both open and closed window, and air sample (gross/net cpm) for particulate and iodine, if applicable. |

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| **8.0 Exercises and Drills (cont.)** | | | |
| | | | b. Radiological data disseminated from the Field Team to the Offsite Field Team Coordinator / Communicator.<br><br>5. Demonstrated the ability to develop dose projections.<br><br>Standard Criteria:<br>a. The Shift Radiation Protection Technician (SRPT) performed timely and accurate dose projections, in accordance with the EPIPs.<br><br>6. Demonstrated the ability to develop appropriate Protective Action Recommendations (PARs), and notified NJ and DE within 15 minutes of a General Emergency declaration or of an update of the previously issued PARs. |

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| **8.0 Exercises and Drills (cont.)** | | | |
| | | | Standard Criteria:<br>a. Total Effective Dose Equivalent (TEDE) and Committed Dose Equivalent (CDE) dose projections from the dose assessment computer code, established in accordance with the EPIPs.<br>b. PARS developed within 15 minutes of data availability.<br>c. PARs transmitted via voice, fax, or electronically within 15 minutes as required by the EPIPs.<br><br>*F. Public Information*<br><br>1. Demonstrated the capability to develop and disseminate clear, accurate, and timely information to the news media.<br><br>Standard Criteria:<br>a. Media briefings provided within approximately 60 minutes of activation of the ENC/JIC. |

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| **8.0 Exercises and Drills (cont.)** | | | |
| | | | 2. Demonstrated the capability to establish and effectively operate rumor control in a coordinated fashion.<br><br>Standard Criteria:<br>a. Calls answered in a timely manner with the correct information.<br>b. Calls returned or forwarded, as appropriate, to demonstrate responsiveness.<br>c. Rumors identified and addressed.<br><br>G. *Evaluation*<br><br>1. Demonstrated the ability to conduct a post-exercise critique, to determine areas requiring improvement and corrective action.<br><br>Standard Criteria:<br>a. Drill and Exercise objectives developed to allow for performance evaluation. |

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| **8.0 Exercises and Drills (cont.)** | | | |
| | | | b. Significant problems in achieving the objectives discussed to ensure understanding of why objectives were not fully achieved.<br><br>8.1.2 On-site emergency response personnel were mobilized in sufficient numbers to fill emergency response positions identified in Section 3, Emergency Response Organization, and they successfully performed assigned responsibilities.<br><br>8.1.3 The exercise was completed within the specified time periods of Appendix E to 10 CFR Part 50,<br>off-site exercise objectives were met, and there were no uncorrected<br>off-site exercise deficiencies; or a license condition requires off-site deficiencies to be corrected prior to operation above 5% of rated power. |

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| **9.0 Implementing Procedures** | | | |
| 10 CFR Part 50, App. E.V – No less than 180 days prior to the scheduled issuance of an operating license for a nuclear power reactor or a license to possess nuclear material, the applicant's detailed implementing procedures for its emergency plan shall be submitted to the Commission. | 9.1 The licensee has submitted detailed implementing procedures for its emergency plan no less than 180 days prior to fuel load. | 9.1 An inspection of the submittal letter will be performed. | 9.1 The licensee has submitted detailed EPIPs for the onsite emergency plan no less than 180 days prior to fuel load. |

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| **10.0 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. | 10.1 The licensee has updated the Letters of Agreements with local emergency response organizations before fuel load for the proposed PSEG Site. | 10.1 An inspection of the updated Letters of Agreements will be performed. | 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 Site. |