

Revised Example S-1 – Site Specific Emergency Planning ITAAC Closure Notification

XX/YY/ZZZZ (Date)

To: NRC

From: {Name of Licensee}
{Site Name and Unit #}
{Docket #}

Subject: Completion of ITAAC C.3.8.01.06.05

The purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) in accordance with 10 CFR 52.99(c)(1) of the completion of {Site Name and Unit #} Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item C.3.8.01.06.05 for verification that field monitoring team(s) demonstrated an ability to make rapid assessment of actual or potential magnitude and locations of any radiological hazards through simulated liquid or gaseous release pathways. The closure process for this ITAAC is based on the guidance described in NEI 08-01 (Reference 1).

ITAAC Statement

Design Commitment:

The means exists 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. [1.8]

Inspections, Tests, Analyses:

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.

Acceptance Criteria:

The field monitoring team(s) was activated and evaluated. They demonstrated an ability to make rapid assessment of actual or potential magnitude and locations of any radiological hazards through simulated liquid or gaseous release pathways. A qualified field team was notified, activated, briefed and dispatched from the EOF during a radiological release scenario. The team demonstrated the procedural guidance in team composition, use of monitoring equipment, communication from the field, and locating specific sampling locations.

November 1, 2012

ITAAC Determination Basis

A test was performed to demonstrate the ability to make rapid assessment of actual or potential magnitude and locations of any radiological hazards through simulated liquid or gaseous release pathways. A radiological release scenario was simulated in accordance with Procedure ABC (Reference 3), and two person field monitoring teams were activated and evaluated; including a vehicle driver and Health Physics Specialist, trained and qualified to monitor for radioactive materials released to the environment and to sample air, soil, vegetation, water, etc., for radioactive material dispersion and deposition.

The teams were staged at ~~the Emergency Operations Facility (EOF) or other location, such as the Offsite Environmental Lab~~, in accordance with the Emergency Plan. ~~The teams were,~~ briefed, dispatched, and directed by the ~~Emergency Operations Facility (EOF)~~ to characterize the size, location, and intensity of the simulated plume, using current and forecasted meteorological conditions. In accordance with Procedure DEF (Reference 4), the EOF provided the direction of the projected plume pathway and specified the data and samples to monitor. By traversing the projected plume pathway, the teams located the projected plume and recorded radiological dose rates and collected air samples in accordance with Procedure GHI (Reference 5). The data collected during the simulation was communicated to the EOF for use in developing dose projections at the site boundary, 2 miles, 5 miles and 10 miles downwind.

During the simulated radiological release scenario, the teams also collected environmental samples including Thermo Luminescent Dosimeters (TLD), soil, water, and vegetations to determine the radiological dispersion/effects within the identified plume area. These samples were collected and returned to the designated environmental lab in accordance with Procedure MNO (Reference 6) for analysis and reporting to the EOF.

Both the field monitoring teams and the EOF demonstrated effective use of their procedures (References 3 through 6), appropriate and successful use of communications equipment (radios and cellular phones), and appropriate use of monitoring, sampling, and dose assessment equipment. The field monitoring teams were effective in locating specific sample locations within the projected plume pathway. The evaluation of the field monitoring teams' performance was documented in accordance with Procedure ABC (Reference 3) in the Exercise Report (Reference 2).

The Exercise Report (Reference 2) demonstrates that field monitoring teams are able to make rapid assessment of actual of potential magnitude and locations of any radiological hazards through simulated liquid or gaseous release pathways. ~~The field monitoring teams were staged at the Offsite Environmental Lab~~~~the EOF, or alternate location~~ in accordance with the Emergency Plan,~~;~~ and were briefed, dispatched, and directed by the EOF. The information contained in the Exercise Report documents the successful completion of ITAAC C.3.8.01.06.05.

ITAAC Finding Review

In accordance with XXX-XXX-XXX (project specific procedure for ITAAC completion), {Licensee} performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC C.3.8.01.06.05 (Reference [79](#)) and available for NRC inspection.

ITAAC Completion Statement

Based on the above information, [Licensee] hereby notifies the NRC that ITAAC C.3.8.01.06.05 was performed for Plant/Unit XYZ, and that the prescribed acceptance criteria are met.

Systems, structures and components verified as part this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

We request NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact XXX at xxx-xxx-xxxx.

Sincerely,

{Signature of Licensee Representative}
{Typed Name of Licensee Representative}
{Title of Licensee Representative}

References (available for NRC inspection)

1. NEI 08-01, Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52.
2. Exercise Report XYZ, of capabilities for rapid assessment
3. Procedure ABC, Conduct of Drills and Exercises
4. Procedure DEF, Procedure for EOF Activation and Operation
5. Procedure GHI, Procedure for Plant Radiological Surveying
6. Procedure MNO, Procedure for Environmental Monitoring
7. ITAAC C.3.8.01.06.05 Completion Package

| November 1, 2012