



February 21, 2013

SBK-L-13037  
10 CFR 50.54(f)

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Seabrook Station

Response to Follow-up Technical Issues on NRC 10 CFR 50.54(f) Request for Information  
Regarding Near-Term Task Force Recommendation 9.3, Emergency Preparedness

References:

1. 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 (ML12073A348).
2. Seabrook letter SBK-L-12229 to NRC, "Response to NRC 10 CFR 50.54(f) Request for Information Regarding Near-Term Task Force Recommendation 9.3, Emergency Preparedness," dated October 31, 2012.
3. NRC Letter, M.A. Mitchell (NRC) to All Power Reactor Licensees, et.al, "Follow-up Letter on Technical Issues for Resolution Regarding Licensee Communication Submittals Associated with Near-Term Task Force Recommendation 9.3 (TAC NO. ME7951)," dated January 23, 2013 (ML13016A111).
4. NextEra Energy Seabrook letter SBK-L-12111, "Emergency Preparedness Information Requested by 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," dated June 8, 2012 (ML12159A377).

On March 12, 2012, the NRC staff issued the Reference 1 letter requesting information pursuant to Title 10 of the Code of Federal Regulations 50.54(f). Enclosure 5 of the letter contains specific Requested Actions and Requested Information associated with Recommendation 9.3 for Emergency Preparedness (EP) programs.

In the Reference 2 letter, NextEra Energy Seabrook, LLC (NextEra Energy Seabrook) responded to Recommendation 9.3 of Reference 1, transmitting the results of the Communications Assessment performed for the Seabrook Station.

After their initial review of the industry responses to Reference 1, the NRC developed a generic set of "Technical Issues" that licensees needed to address as part of their Communications Assessments (Reference 3). As part of the development of the Reference 3 letter, NRC Staff held a conference call with NextEra Energy Seabrook personnel on January 17, 2013 to discuss those Technical Issues and to specify the supplemental information needed from NextEra Energy Seabrook to complete their review of Reference 2.

The Enclosure to this letter provides the requested supplemental information on the Seabrook Station Communications Assessment.

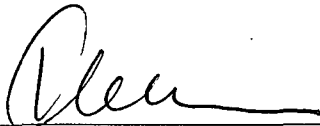
This submittal contains no new commitments or changes to any previous commitments.

Should you have any questions regarding this letter, please contact Mr. Michael O'Keefe, Licensing Manager, at (603) 773-7745.

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

Executed on *FEBRUARY 21, 2013.*

Sincerely,



---

Kevin T. Walsh  
Site Vice President  
NextEra Energy Seabrook, LLC

Enclosure

cc: NRC Region I Administrator  
J. G. Lamb, NRC Project Manager, Project Directorate I-2  
NRC Senior Resident Inspector  
Director, Office of Nuclear Reactor Regulation  
Ms. Jessica A. Kratchman, NRR/JLD/PMB, NRC  
Mr. Eric E. Bowman, NRR/DPR/PGCB

**Enclosure**

**Response to Follow-up Technical Issues on NRC 10 CFR 50.54(f) Request for Information  
Regarding Near-Term Task Force Recommendation 9.3, Emergency Preparedness**

## **Response to Follow-up Technical Issues on NRC 10 CFR 50.54(f) Request for Information Regarding Near-Term Task Force Recommendation 9.3, Emergency Preparedness**

### **Background**

On March 12, 2012, the NRC staff issued a letter titled, "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." In part, the request for information asked that licensees assess their current communications systems and equipment during a large scale natural event and loss of all alternating current power. On October 31, 2012, licensees responded to the staff's request for information regarding communications. Upon the staff's review of the licensee's communications submittals, the staff has identified generic technical issues which need to be resolved in order for the staff to complete its review.

### **Generic Technical Issue 1:**

The staff identified that licensees need to discuss how the power for the equipment analyzed is expected to be available, and how the planned communications enhancements are expected to be maintained. The following areas were identified:

- A. A detailed description of how power will be maintained for (1) planned or potential enhancements to the communication links and (2) existing equipment analyzed to be available.
  - 1. The number of replacement batteries expected to be needed for a 24-hour duration, per the Nuclear Energy Institute (NEI) 12-01 "Guideline for Assessing Beyond Design Basis Accident Response Staffing and Communications Capabilities".
  - 2. Generator availability to charge batteries without offsite equipment for a duration of 24 hours.
  - 3. A description of how ancillary equipment supports operations for a 24-hour duration (e.g., adequacy of fuel supplies for the generators; and the minimum number of battery chargers expected to be necessary).

### **Response**

- 1. Number of Replacement Batteries Expected to Be Needed for a 24-hour Duration
  - a. Each of the nine (9) satellite telephones to be maintained in emergency facilities for use during a beyond design basis loss of power event (2 in Control Room, 3 in Technical Support Center (TSC), 4 in Emergency Operations Facility (EOF) is equipped with a spare battery and a charger for the spare battery. Each battery is good for up to 8 hours of operation and can be recharged in 3-4 hours allowing for 24 hour operation of the satellite telephones.

- b. There are approximately 80 portable radios onsite available for use by plant monitoring and repair teams. These radios are primarily assigned to Operations and Radiation Protection use and are located in the Control Building, the Turbine Building and the Administration & Services Building. Portable radios assigned to Security are not included in this number. Charging capacity is available for half of the radios at any given time. Seabrook Station uses high capacity batteries at a low power setting in its portable radios. Based on operating experience at Seabrook Station, a portable radio battery will power a radio for 8-12 hours.

## 2. Generator Availability to Charge Batteries Without Offsite Equipment For 24 Hours

- a. A 6KW diesel powered portable generator is dedicated onsite for charging spare satellite telephone and portable radio batteries. The portable generator has sufficient capacity to power the chargers for the 5 onsite satellite telephone spare batteries and the chargers for portable radio spare batteries on a continuous basis. The portable generator dedicated to satellite telephone and portable radio chargers will be maintained on the 75 ft level of the Turbine Building to be available in close proximity to the Control Room and TSC. Extension cords and power strips will be maintained with the portable generator to accommodate the chargers.
- b. A second 6KW diesel powered portable generator is dedicated onsite for powering the in-plant telephone PBX. The in-plant telephone PBX operates telephone equipment inside the station power block, including the Control Room, TSC, Operations Support Center (OSC), and other locations in the power block equipped with telephone handsets. The in-plant PBX equipment is located on the 21 ft level of the Administration & Services Building and is comprised of 2 line interface modules and 1 network switch. Each of these 3 components can be plugged into the portable generator to maintain telephone service in the plant. The portable generator dedicated to this purpose will be stored in the Auxiliary Boiler Room on the 21 ft foot level of the Administration & Services Building adjacent to the location of the in-plant PBX.

## 3. Description of How Ancillary Equipment Supports Operations for 24 Hours

- a. There are seven, six-bay, portable radio battery chargers designated for Operations use that are currently situated in the Control Building and Turbine Building. A portable radio battery can be charged to full capacity in less than twelve hours. The chargers have the capacity to charge 42 portable batteries simultaneously. There is sufficient charging capacity to provide continuous operation of more than 40 portable radios available for field monitoring and repair team use.

- b. Diesel fuel for the portable generators is available from multiple sources onsite. The primary fuel sources for the two portable generators include:
  - (1) 30 gallon fuel oil caddy located on the north wall of the Lube Oil Storage Building. This fuel caddy is staged for emergency use for the Cooling Tower Makeup Pump per Operations abnormal procedure OS1016.07, Cooling Tower Portable Makeup Pump Operation. The fuel would be available to fuel the portable generator dedicated to powering the spare battery chargers if not required for the cooling tower makeup pump. The Lube Oil Storage Building is a single story, concrete structure located adjacent to the Turbine Building.
  - (2) Emergency Diesel Generator day tanks located inside the Emergency Diesel Generator Buildings. There are two 1,584 gallon fuel oil day tanks, one in each of the two Emergency Diesel Generator Buildings. The Emergency Diesel Generator Buildings are seismic category 1 structures. Category 1 structures are designed to remain functional if a Safe Shutdown Earthquake (SSE) occurs and to withstand the vibratory motion of an Operating Basis Earthquake (OBE).
- c. A five gallon container for transporting the fuel from the fuel sources to the portable generators will be maintained with the portable generator.
- d. The 6KW portable diesel generators have a 4.6 gallon fuel tank. They are rated to run on one tank of fuel for up to 6 hours of continuous use at rated load. Each battery charger uses 3 amps. At 3 amps and 120 VAC each, the 7 battery chargers would use 2520 watts. Therefore, the battery charger load on these generators is less than half of the generators rated load. In this case, a tank of fuel is expected to last for at least 12 hours. Sufficient fuel is available from the 30 gallon fuel caddy located in the Lube Oil Storage Building adjacent to the Turbine Building to run the portable generator dedicated for charging spare batteries for 24 hours. The power load of the in-plant PBX is not known exactly. Experience with providing temporary power to similar components elsewhere onsite has shown that a line interface module and associated equipment can be adequately powered with a 2KW portable generator. This experience indicates that a 6KW portable generator is adequate to power the in-plant PBX equipment (2 line interface modules and a network switch). Sufficient fuel for powering the generator dedicated to operating the in-plant PBX is available from fuel oil sources in the nearby Emergency Diesel Generator day tanks.
- e. Procedures will be developed for deploying, operating and fueling the portable generator dedicated to charging spare batteries. The procedures will describe operation of the generator, retrieval of the chargers from their current locations, connecting the chargers to the generator, obtaining fuel from the onsite fuel supplies, and fueling the portable generator. Similar procedures will be developed for the generator dedicated to operating the in-plant PBX.

- f. Spare batteries for the four satellite telephones for use in the EOF will be maintained in chargers in the EOF. The EOF standby generator will be relied on for maintaining power to these chargers. The EOF is equipped with a 500 KW diesel generator. The fuel tank has a 2700 gallon capacity that will run the generator continuously for 72 hours at 100% load.

## **Generic Technical Issue 2:**

The use and function of the planned enhancements for the improvement of communications.

- A. A description of the use of the planned enhancements.
  1. A discussion of whether each planned enhancement identified is only to be used for maintaining the communication link identified, or if it is expected to be shared among other communication links.
  2. A general description of the planned enhancement and how the equipment will be integrated.
  3. The title and general description of the procedure that will be developed and used by plant personnel to describe protocols for shared usage of communication capabilities.

## **Response**

1. Description of Intended Exclusive Use of the Planned Enhancement
  - a. Section 4.6 of the NextEra Energy Seabrook communications assessment describes how the planned enhancements are intended to be used. The described enhancements will be used to support specified emergency response functions. Satellite telephones will be used for specified functions in the Control Room, TSC and EOF. Dedicated portable diesel generators will be used to power chargers for satellite telephone and portable radio spare batteries and to power the in-plant telephone PBX. Multi-use functions of the planned enhancements are not intended.
2. General Description to the Planned Enhancement and How It Will Be Integrated
  - a. A 6KW portable diesel generator is planned to be dedicated to power the in-plant telephone PBX to provide telephone communications among the Control Room, TSC and OSC, as well as OSC communication with in-plant teams deployed to locations in the plant where telephone handsets are available. This portable diesel generator will be stored on the 21 ft level of the Administration & Services Building in proximity to the in-plant PBX.
  - b. A 6KW portable diesel generator will be dedicated to powering battery chargers for satellite telephone and portable radio spare batteries. This portable diesel generator will be stored on the 75' level of the Turbine Building in proximity to the Control Room and TSC.

- c. As described in Attachment A of the assessment, nine satellite telephones will be dedicated to the following purposes in the Control Room, TSC and EOF:
  - 1) Control Room for ORO communication
  - 2) Control Room for NRC communication
  - 3) TSC for NRC communications
  - 4) TSC for communication between TSC and EOF facility leads
  - 5) TSC for communication of operational data to the EOF
  - 6) EOF for ORO communication
  - 7) EOF for NRC HPN communication
  - 8) EOF for communication between TSC and EOF facility leads
  - 9) EOF for receipt of operational data from the TSC
  
- d. Spare antennas and cabling will be maintained in the EOF and the Pow Wow Hill repeater facility for the purpose of maintaining radio communications with field monitoring teams via the siren control frequency.

3. Title and General Description of the Procedure for Shared Usage

Shared usage of the communications enhancements described above is not intended.

**Generic Technical Issue 3:**

The protection of the new equipment purchased as a planned enhancement as well as the protection of existing communications equipment analyzed as being available.

- A. A discussion of how the existing equipment analyzed to be available and enhancements to these communication links as well as associated ancillary equipment will be stored in a manner that is protective from a large scale natural event.
  - 1. A description of pre-identified areas that are considered protective for existing equipment and whether new equipment will be stored in a similar location. The title and brief description of a procedure for new communications equipment storage is acceptable, if this procedure is planned to be developed in the future; or a statement that this will be completed in alignment with NRC order EA-12-049.
  - 2. Equipment stored offsite, should have an analysis of duration to set-up this equipment for use.
  - 3. The analysis demonstrates that the existing equipment that is expected to be available will be functional.



## Response

### 1. Description of Pre-identified Areas That Are Considered Protective

- a. The onsite satellite telephone equipment including the 5 handsets, 1 docking station, antenna, cabling, spare batteries and chargers will be stored in the Control Room/TSC within the Control Building. The Control Building is a seismic Category 1 reinforced concrete structure. The Control Room/TSC is located on the 75 ft level of this structure; thus, it provides robust protection from flooding and high wind conditions.
- b. One portable generator dedicated to powering spare battery chargers will be stored on the 75 ft level of the Turbine Building, immediately adjacent to the Control Building. One portable generator dedicated to powering the in-plant telephone PBX will be stored in the auxiliary boiler room located on the 21 ft level of the Administration & Service Building in close proximity to the in-plant PBX on the 21 ft level of the Administration & Service Building. The 21 ft level of the structure is above the maximum projected flood level for the Seabrook Station site of 20.6 ft.
- c. System Description of Structural Design Criteria for Seabrook Station (SD-66), dated October 1976, defines the applicable standards, load combinations, allowable stress limits, and the acceptance criteria for Seabrook Station structures. Per SD-66, the Control Building is a Category 1 structure. The Turbine Building and the Administration & Services Building are non-Category 1 structures. Category 1 structures are designed to withstand the vibratory motion of an Operating Basis Earthquake (OBE) and the larger Safe Shutdown Earthquake (SSE). Non-Category 1 structures are designed in accordance with Uniform Building Code (UBC) seismic zone 3 criteria. Seismic zone 3 criteria are conservative in that Seabrook Station is actually located in seismic zone 2A. Seismic zone 2A is not associated with a particular fault zone and is subject to low to moderate ground motion activity from a seismic event. Seismic zone 3 ground motion criteria are twice that of seismic zone 2A. In addition, the Turbine Building and Administration & Services Building are designed such that they will not collapse under SSE and tornado loads on adjacent Category 1 structures. Per Table 4.2-1 of SD-66, the uniformly distributed design loads of the Turbine Building and Administration & Services Building (100 PSF) are comparable to those of some station Category 1 structures. Category 1 and Non-Category 1 structures at Seabrook Station are designed to withstand 110 mph wind which has a recurrence period of 100 years.
- d. The 80+ UHF portable radios that would be used for in-plant monitoring and repair team communications are controlled primarily by the Operations and Radiation Protection Departments. These radios are maintained primarily in the Control Building, Turbine Building and Administration & Services Building. From these locations, they are readily available to the OSC when needed. The 80+ portable radios are more than sufficient to equip in-plant

teams that would be deployed from the OSC during the postulated conditions over a 24 hour period. For the reasons described above, they are reasonably protected from flooding, high winds and seismic events in their current storage locations.

- e. The seven, six-bay chargers that would be needed to charge spare satellite telephone and portable radio batteries are maintained in the Control Building, Turbine Building and Administration & Services Building. From these locations, they are readily available to the 75 ft level of the Turbine Building if needed. For the reasons described above, they are reasonably protected from flooding, high winds and seismic events in their current storage locations.
- f. The 4 satellite telephones for Offsite Response Organization (ORO, NRC and TSC communications from the EOF and spare antenna and cabling for field monitoring radio communications will be stored in the EOF. A new Seabrook Station EOF is currently under construction and is expected to be available during the 3<sup>rd</sup> quarter of 2013. The new EOF is a masonry and steel structure designed to withstand 100 mph winds. The EOF is located outside the 100 year flood plain and is not subject to severe seismic effects (i.e., seismic zone 2A). The equipment stored at the EOF will therefore be reasonably protected from flooding, high winds and seismic events.
- g. The radio repeater equipment and the spare antenna and cabling to support radio communications with field monitoring teams will be maintained in a single story, masonry structure on Pow Wow Hill in Amesbury, MA. The Pow Wow Hill structure is a recently constructed, single story, concrete building that is situated 325 feet above sea level. The Pow Wow Hill facility location is not subject to severe seismic effects (i.e., seismic zone 2A). For these reasons, the equipment maintained at the Pow Wow Hill facility is reasonably protected from flooding, high winds and seismic events.

## 2. Duration for Set-up of Equipment Stored Offsite

- a. Offsite equipment that will need to be setup under the assumed conditions will be spare antennas and spare cabling to radio equipment at the EOF and at the Pow Wow Hill facility to support radio communications with field monitoring teams. The roof of the EOF is accessible by an installed interior ladder. At the EOF, the activity will involve ERO personnel affixing one spare antenna on the roof of the facility and running spare cabling from the antenna to a base station currently located in the EOF. Procedure development and personnel training will determine how long this process will take; however, it is reasonable to assume that this activity can be accomplished within one hour of arrival of personnel at the facility.
- b. The Pow Wow Hill facility is located approximately 5 miles from Seabrook Station, and can be accessed from Seabrook Station under normal conditions within approximately 15 minutes. There are existing cable portals in the facility to allow access from a spare antenna to existing radio equipment in the

facility. This activity will involve ERO personnel affixing one spare antenna on the facility and running spare cabling from the antenna to a radio repeater currently located in the facility. Procedure development and personnel training will determine how long this process will take; however, it is reasonable to assume that this activity can be accomplished within one hour of arrival at the facility.

### 3. Analysis of Why Existing Equipment Expected to Be Available Will Be Functional

- a. In addition to the recently acquired satellite telephones and portable diesel generators, the existing equipment that is expected to be available is comprised primarily of:
  1. Portable radios and portable radio spare battery chargers maintained onsite,
  2. Base station and repeater radio equipment maintained in offsite facilities.
- b. Seabrook Station radio equipment, including portable radios and spare battery chargers, are subject to annual maintenance and testing per station maintenance procedure SIR.100. The annual radio surveillance includes testing for transmittal power and frequency error. The maintenance program replaces portable radio batteries at least every five years.
- c. The onsite portable radios and battery chargers are used routinely. Non-functioning equipment is identified on an on-going basis and repaired or replaced.
- d. The EOF radio equipment is tested quarterly per the Emergency Preparedness Facility and Equipment Inventory program. It is also operated regularly during quarterly emergency response organization drills.
- e. The Pow Wow Hill radio repeater equipment is tested during bi-weekly tests of the Seabrook Station siren system.

#### **Generic Technical Issue 4:**

The programmatic controls for the use of the new equipment purchased as a planned enhancement.

- A. A description of planned proceduralization and training for the use of these planned enhancements. It is acceptable to provide the title and description of a new procedure for new communications equipment.
  1. A description of any credited manual actions and their procedures.
  2. A description of any maintenance for this equipment, including operability testing,

3. A description of any periodic inventory checks.
4. A description of planned staff training.

## Response

### 1. Description of Planned Procedures

- a. The following typical procedures will be developed to support use of equipment employed as planned enhancements prior to implementation at the end of the 3<sup>rd</sup> quarter 2013. During the procedure development phase, it may be determined that some procedures can be consolidated or that additional procedures are required.
  1. Use of Satellite Telephones by Control Room Personnel for State Notification – Provide instructions to the Shift Communicator in use of the dedicated satellite telephone to contact NH and MA state warning points for notification of a declared emergency.
  2. Use of Satellite Telephones by Control Room Personnel for NRC Notification – Provide instructions to the Control Room Communicator in use of the dedicated satellite telephone for notification of NRC Headquarters of a declared emergency
  3. Installation of a Satellite Telephone Antenna on the Roof of the Control Building with Cabling to the Satellite Telephone Docking Station in the TSC – Provide instructions to TSC staff for installation of the satellite telephone docking station antenna on the Control Building roof and for running cable down the stairway from the roof into the TSC to the satellite telephone docking station positioned in the TSC.
  4. Use by TSC Staff of Satellite Telephone for Communication with the NRC – Provide instructions to the TSC ENS Communicator in use of the satellite telephone dedicated in the TSC for communication with NRC Headquarters.
  5. Use by TSC Staff of Satellite Telephone for Communication Between the TSC and EOF Facility Leads – Provide instructions to the TSC facility lead (Site Emergency Director) in use of the satellite telephone dedicated in the TSC for communication with the EOF facility lead (Response Manager)
  6. Use by TSC Operations Staff of Satellite Telephone for Communication of Operational Data to the EOF – Provide instructions to the Operations staff in the TSC (Emergency Operations Manager and Operations Technician) in use of the satellite telephone dedicated in the TSC for communication of operational data to EOF technical staff (Technical Assistant)

7. Connection of Portable Generator Equipment to the In-plant Telephone PBX – Provide instructions to shift staff (Nuclear System Operators) for retrieval of the portable generator dedicated to power the in-plant telephone PBX, connection of the in-plant telephone PBX equipment to the portable generator, and operation of the portable generator to power the in-plant telephone PBX.
8. Setting Up Portable Generator Equipment in the Turbine Building to Charge Satellite Telephone and Portable Radio Batteries – Provide instructions to ERO staff (OSC personnel) for retrieval of the portable generator dedicated to power satellite telephone and portable radio spare batteries, retrieval of the required number of battery chargers, connection of the portable generator to the battery chargers, and operation of the portable generator to power the battery chargers.
9. Fueling Portable Generators – Provide instructions to ERO staff (OSC personnel) for obtaining fuel from any one of the various diesel fuel sources to refuel the 4.6 gallon tanks on the portable generators powering the in-plant telephone PBX and the spare battery chargers.
10. Installation of Spare Antenna and Cabling for Radio Operation at the EOF – Provide instructions to EOF staff (offsite monitoring personnel, offsite monitoring coordinators, offsite monitoring communicators, IM specialists) for retrieval and installation of spare antennas on the EOF roof and for running cables from the EOF roof to existing radio equipment in the EOF.
11. Installation of Spare Antenna and Cabling for Radio Operation at the Pow Wow Hill Repeater Facility – Provide instructions to EOF staff for retrieval of the spare antenna and cable at the Pow Wow Hill facility and for running the cable to the existing radio repeater equipment in the Pow Wow Hill facility.
12. Use by EOF Staff of Satellite Telephone for Communication Between the EOF and the TSC – Provide instructions to the EOF facility lead (Response Manager) for use of the dedicated EOF satellite telephone for communication with the TSC facility lead (Site Emergency Director)
13. Use by EOF Staff of Satellite Telephone for State Notification- Provide instructions to the EOF communicator (EOF Coordinator) for use of the EOF dedicated satellite telephone for notification of the NH and MA State EOCs of emergency declarations and protective action recommendations.
14. Use by EOF Staff of Satellite Telephone for HPN Communication with NRC Region – Provide instructions to the EOF HPN Communicator for use of the dedicated EOF satellite telephone for communication with NRC Region 1.

15. Use by EOF Technical Staff of Satellite Telephone for Receipt of Operational Data from the TSC – Provide instructions to the EOF technical staff (Technical Assistant and Training Center Staff) for use of the dedicated EOF satellite telephone for receipt of technical data from the TSC Operations staff.

## 2. Description of Maintenance Activities, Including Operability Testing

The satellite telephone equipment and the portable generators purchased to support planned enhancements will be maintained in accordance with manufacturer specifications. Responsibility for maintenance of the equipment will be assigned to appropriate station personnel (e.g., Information Management staff for satellite telephone equipment, Maintenance Services staff for portable generators).

## 3. Description of Periodic Inventory Checks

Periodic inventories of the equipment maintained in emergency response facilities will be incorporated into the Emergency Preparedness Department Facility and Inventory (EPFI) program. The equipment will be inventoried quarterly. Operational checks of the equipment will be done semi-annually. Results will be documented per the EPFI program. Portable generators will be operationally checked in accordance with manufacturer specifications.

## 4. Description of Planned Staff Training

Training on the procedures identified above will be incorporated into the initial and annual re-qualification training of ERO personnel. Annual continuing training will include training on retrieval and operation of the portable generators dedicated to powering the in-plant PBX and spare battery chargers.

### **Generic Technical Issue 6:**

How plant personnel will be notified in the event of a large scale natural event that causes a loss of all AC power.

- a. A description and title of the procedure for emergency notification of essentially all plant staff within 30 minutes [If applicable to the licensee Emergency Plan].
- b. A description and title of the procedure for notification of emergency response organization staff (i.e., self-activation) [If applicable].

### **Response**

- a. Section 4.2 of the communications assessment describes how plant personnel will be notified of a Large Scale Natural Event (LSNE). The event would result in at least the declaration of a Site Area Emergency per Seabrook Station

emergency classification procedures. A public address announcement would be made to plant personnel of the emergency classification and instructions to leave the site or report to emergency response facilities per emergency response procedure ER 1.2, Emergency Plan Activation.

- b. Section 4.4 of the communications assessment describes how offsite Emergency Response Organization (ERO) members would be notified. Offsite ERO personnel are instructed to report to their assigned emergency facilities in the event of a wide area loss of grid event per station procedure NM11700, Emergency Preparedness Responsibilities of Primary, Subject-to-Call and Secondary Emergency Response Organization Members. Training on this expectation is provided to ERO members during initial ERO qualification training and annual web-based re-qualification training.

### **Generic Technical Issue 7**

How communications will be maintained during the period of final implementation of the communication enhancements.

- A. Identification and description of the interim actions that will be in place to bridge the gap until all final mitigation strategies being proceduralized are implemented. This also includes equipment protection.

### **Response**

The Executive Summary and Attachments A, B, C, D, and E of the NextEra Seabrook communications assessment describe the existing diverse set of communications systems designed to ensure reliable communications during normal and emergency situations at Seabrook Station. These systems continue to be maintained in accordance with station maintenance and surveillance procedures.

In addition to the capability described above, Seabrook Station has acquired the satellite telephone equipment and portable diesel generator equipment identified as enhancements in the NextEra Seabrook communications assessment. In Reference 2, NextEra Seabrook committed to implementation of the enhancements during the 3<sup>rd</sup> quarter 2013, no later than September 30, 2013. Implementation will include development of procedures, personnel training, deployment of the equipment, and incorporation of the equipment into existing station inventory and operability surveillance programs,

### **Generic Technical Issues 5 and 8:**

Per discussion with NRC staff on January 17, 2013, information provided in the communications assessment submitted on October 31, 2012, was sufficient and no additional information was requested from Seabrook Station for generic technical issues 5 and 8.