

## BellBendeRAIPEm Resource

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**Sent:** Wednesday, February 19, 2014 3:08 PM  
**To:** rrsgarro@pplweb.com  
**Cc:** BellBendeRAIPEm Resource; Woodring, Kathryn L (KFitzpatrick@pplweb.com); Kirkwood, Jon Kevin (jon.kirkwood@unistarnuclear.com); Gambone, Kimberly; Barss, Dan; Miernicki, Michael  
**Subject:** Bell Bend SCOLA draft RAI 129-7400 - Emergency Planning  
**Attachments:** Draft RAI 129-7400 .docx

Rocky,

Attached is draft RAI No. 129-7400 regarding Emergency Planning for the Bell Bend COL application. Please review and let me know at your earliest convenience if a clarifying conference call is needed or that the RAI can be sent to you as final.

Contact me if you have any questions.

Thanks,

*Mike Takacs  
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Office of New Reactors  
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## Draft Request for Additional Information 129-7400

Issue Date: 02/19/2014

Application Title: Bell Bend Docket Number 52-039

Operating Company: PPL Bell Bend LLC.

Docket No. 52-039

Review Section: 13.03 - Emergency Planning

Application Section: FSAR 13.3 and COLA Part 5

### QUESTIONS

#### 13.03-53

Section 13.1.2, "Operating Organization," of the BBNPP FSAR states "Figures incorporated into Section 17.5 show the authority and lines of communication for the BBNPP Organization." Staff finds no figures incorporated into FSAR Section 17.5, Rev. 4 as stated. Provide figures or correct the reference to figures that show the authority and lines of communication for the BBNPP Organization as stated in FSAR Section 17.5 or justify why this is not necessary.

#### 13.03-54

In the applicant's response to RAI 70, Question 13.03-16 (B-10), the applicant stated in part that, "There are currently no specific requirements or guidance development for the staffing of additional on shift I&C positions... ERO staffing levels are established based on: ... (2) requirements for shift personnel to be able to perform immediate actions to place the plant in a safe condition." On-shift facility licensee responsibilities for emergency response are to be unambiguously defined with adequate staffing to provide initial facility accident response maintained as per the regulations of 10 CFR 50.47(b)(2). NRC guidance for staffing of additional on shift I&C positions (normal or emergency) is found in NUREG-0654 Rev. 1, Table B-1 and calls for one I&C technician within 30 minutes. If a 30 minute I&C responder is not part of the emergency response, then provide information for who is going to perform this function without collateral duty or justify why this is not necessary.

#### 13.03-55

RAI 111, Question 13.3-40 (Supplemental to RAI 13.3-12) stated, "It is the NRC's expectation that emergency planning will identify competing priorities and minimize the number of ad hoc decisions to be made by the Shift Supervisor," and asked the applicant to "discuss which on-shift emergency responders identified in Table B-1a, 'Shift Emergency Response Organization,' of the BBNPP Emergency Plan will be qualified to perform the major tasks of: a. dose assessment, b. offsite surveys, c. onsite surveys, d. core/thermal hydraulics, and e. electrical/instrumentation control. If on-shift responders to perform this function do not exist, revise the BNPP Emergency Plan to include 30-minute responders to perform the major tasks." In the applicant's response to Supplemental RAI 13.3-12, the applicant stated "If the on shift staffing analysis reveals an overlap in tasks, then actions will be taken to address the issue at that time which may include additional on shift personnel. Thirty (30) minute responders will not be added to the emergency plan as it is not realistically possible for personnel to respond to the BBNPP station in that period of time."

The NRC's analysis of the on-shift staffing cannot be completed until the staffing plan is established. Each applicant shall specify the on-shift emergency response positions and major tasks to be performed by the persons assigned to the emergency response functions in the staffing plan. If thirty (30) minute responders are not identified then the applicant should specify alternate on-shift staff to perform primary emergency response functions without collateral duty. Provide an on-shift staffing plan which addresses the guidance of NUREG-0654 Rev.1, B.5 and Table B-1, as appropriate to satisfy the requirements of 10 CFR 50.47(b)(2).

#### 13.03-56

BBNPP Emergency Plan, Rev. 3, Part II, Section C.1.b. states, "If needed, federal resources are made available to the Licensee in an expeditious and timely manner." Please provide the timeframe (i.e.: 30 minutes, 60 minutes, etc.) of the availability of resources or justify why this is not necessary. This information is required to determine conformance with the guidance of NUREG-0654/FEMA-REP-1, Revision1, Part II.C.1.b.

#### 13.03-57

BBNPP COL Part 5, Rev. 4, Section B.3, page B-2, reads "The Emergency Plant Manager, after having relieved the Shift Manager of the Emergency Director responsibilities, is responsible for continued assessment of the severity of the emergency and overall direction of the ERO as appropriate in accordance with the guidance provided in the E-Plan and the plan emergency implementing procedures." Does the applicant intend to mean "...and the plan emergency implementing procedures," or "... and the plant emergency implementing procedures," or "Emergency Plan Implementing Procedures (EPIPs)?" Please clarify this statement.

### 13.03-58

BBNPP COLA , Part 5, Section C, Rev. 4, states that Sections A and B of the plan identify the specific individuals, by title, who are authorized to request federal assistance. This information was not found in Section A or B. Identify the specific individuals, by title, who are authorized to request federal assistance as required by 10 CFR 50.47(b)(3) or justify why this is not necessary.

### 13.03-59

BBNPP, Part 5, Section C, Rev. 4, refers to assistance providers listed in an "Emergency Telephone Directory." Rev. 4 of the application did not include a copy of the "Emergency Telephone Directory." Provide a copy of the "Emergency Telephone Directory," or provide a list of those organizations relied on as "assistance providers." If this information is not available at this time, propose an ITAAC to provide this information in the future when it is available as per the regulation of 10 CFR 50.47(3), or justify why this is not necessary.

### 13.03-60

BBNPP COLA, Part 5, Section G.1, Rev. 4. states that "The Commonwealth has overall responsibility for maintaining a continuing disaster preparedness public education program. The emergency public information publication for the Licensee nuclear sites is updated annually, in coordination with Commonwealth and local agencies, to address how the general public is notified and what their actions should be in an emergency." It is not clear which organization is responsible for the annual updates of the emergency public information publication. State which organization is responsible for maintaining the emergency public information publication per the regulations in 10 CFR Part 50, Appendix E Section IV.D.2 or justify why this is not necessary.

### 13.03-61

ITAAC 7.1.1 states "The BBNPP TSC contains a minimum working space of square feet." Provide a quantitative value of how many square feet the TSC will contain in accordance with NUREG-0696 or justify why it is not necessary. This information is required per the regulation of 10 CFR 50.47(b)(8).

### 13.03-62

ITAAC 7.2.1.2 references Acceptance Criterion 5.1.1. There is no Acceptance Criteria 5.1.1 in Part 10: ITAAC, Rev. 4. Include Acceptance Criterion 5.1.1 as stated or correct the numbering scheme. This information is needed per the regulation of 10 CFR 50.47(b)(8).

### 13.03-63

Clarify that Data System Equipment referenced in ITAAC 7.1.5 has the capability to store data in addition to gathering and displaying data needed in the TSC to analyze plant conditions. This clarification is needed to show alignment with NUREG-0696 and compliance with 10 CFR 50.47(b)(8).

### 13.03-64

ITAAC 8.4 Acceptance Criteria reads, "The BBNPP Control Room, TSC and EOF can acquire." Complete the ITAAC per requirement of 10 CFR 50.47(b)(9) or justify why this is not necessary.

### 13.03-65

BBNPP COL Part 5.II.J.4, Rev. 4, "Evacuation" states in part that, "Evacuation shall commence in accordance with site procedures as directed by the Emergency Manager,... unless one of the following exist: Severe weather, significant radiological hazard, security threat, or a condition similar to the above in magnitude." Explain or reference where it is stated in the COL application how the COL addresses provisions for evacuation routes and transportation for onsite individuals to some suitable offsite location, including alternatives for inclement weather, high traffic density and specific radiological conditions as NUREG-0654/FEMA-REP-1, Rev. 1 outlines in Section J.2.

### 13.03-66

BBNPP COL Part 5.II.J.4, Rev. 4, "Evacuation" states, "Evacuation shall commence in accordance with site procedures as directed by the Emergency Plant Manager or his/her designee." Clarify that there is an EPIP for evacuation and accountability and provide the EPIP title or number.

### 13.03-67

BBNPP COL Part 5.II.J.3, Rev. 4, states that personnel and vehicles would be monitored and decontaminated at the Susquehanna Energy Information Center or the West Building. Provide, in the emergency plan, a reference to the EPIP title or number for monitoring and decontamination of personnel and vehicles.

### 13.03-68

Provide the action levels for determining the need for decontamination of personnel and vehicles monitored and decontaminated at the Susquehanna Energy Information Center or the West Building per requirement of 10 CFR 50.47(b)(11) or explain why this is not necessary.

### 13.03-69

The emergency plan does not contain a statement that the Public Notification System (PNS) or Emergency Alerting System (EAS) will be tested as part of any drill or exercise. Provide the objective for testing the public alert and notification system as required by 10 CFR 50, Appendix E, IV.F.2 or justify why this is not necessary.

### 13.03-70

FSAR Table 13.4-1, Rev. 4, "Operational Programs Required by NRC Regulations and Program Implementation," lists the same implementation milestone twice, "A detailed analysis demonstrating that on-shift personnel assigned emergency plan implementation functions are not assigned responsibilities that would prevent the timely performance of their assigned functions as specified in the emergency plan submitted no less than..." with different time periods, one for 180 days and the other for 2 years prior to scheduled date for initial fuel load. Please revise this table to provide for which timeframe the applicant intends to use for meeting the implementation milestone per the requirement of 10 CFR Part 50, Appendix E, Section IV.A.9.

### 13.03-71

With regard to Table 2.3-1, "Emergency Planning ITAAC," Planning Standard 4.0, "Notification Methods and Procedures", clarify that the Acceptance Criteria for Inspections, Tests, Analysis item 4.3.3, is "FEMA concurrence BBNPP that greater than 94% of ANS sirens are capable of performing their function." This acceptance criteria is not numbered and is not written clearly. Please revise the table by numbering the Acceptance Criteria and re-wording the acceptance criteria as necessary such that the wording is clearly understandable.