

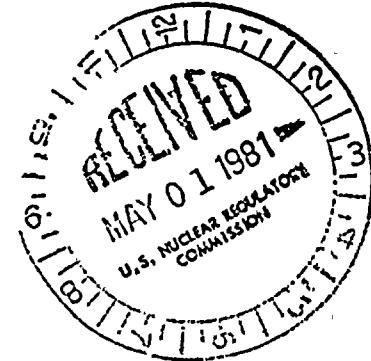
FLORIDA POWER & LIGHT COMPANY

April 28, 1981
L-81-185

Operating Reactors Branch #3
Attention: Mr. Robert A. Clark
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Clark:

Re: St. Lucie Unit 1
Docket No. 50-335
Emergency Plan Review



Responses to NRC Emergency Plan Review comments to Florida Power & Light Company's St. Lucie Plant Radiological Emergency Plan submittal of 1/2/81 are attached. A schedule to revise the Plan to incorporate these responses, indicating the expected timing of the issuance of the State of Florida Emergency Plan, is also enclosed.

In the attached review comments, the following characters were used to aid in differentiating NRC review comments from Florida Power & Light Company responses:

- NRC review comment
- * FPL response

References to specific Annexes and Sections of the State Plan will be incorporated into the next revision to the St. Lucie Plan.

The Alert and Notification System (Early Warning System) will be described through separate correspondence to the NRC. Additionally, information regarding Table B-1 of NUREG-0654, Rev. 1 will be discussed in a letter responding to a request from Darrell G. Eisenhut (dated 2/18/81) by June 1, 1981.

Very truly yours,

Robert E. Uhrig
Vice President
Advanced Systems and Technology

REU/JJM/mbd

Attachments

cc: Mr. J.P. O'Reilly
Harold F. Reis, Esquire

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PERSONAL PRIVACY INFORMATION
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FREEDOM OF INFORMATION ACT

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SCHEDULE

ST. LUCIE PLANT RADIOLOGICAL EMERGENCY PLAN

REVISION 9

- 4/27 Submittal of responses to NRC Review Comments on 1/2/81 .
submittal of Plan.
- 4/20 - 24 Comments to informal FEMA review of State Plan expected to
be completed, except site annexes.
- 6/16 - 17 Informal FEMA review of State Plan, site annexes.
- 7/17 Receive revised State Plan
- 8/1 Complete Revision 9 to St. Lucie Plant Radiological
Emergency Plan including:

1) Responses to NRC Review Comments
2) Revision of Appendices (as available)
3) Resolution of any inconsistancy with State Plan.

EMERGENCY PLAN REVIEW
ST. LUCIE UNIT 1
FLORIDA POWER & LIGHT COMPANY

The following comments apply to St. Lucie Unit 1 Emergency Plan (Plan) and identify, in parenthesis, the applicable evaluation criteria of NUREG-0654, Rev. 1.

A. Assignment of Responsibility (Organizational Control)

- The Plan does not describe the local organizations within the Emergency Planning Zones (EPZ). (A.1.a)
- * Counties that fall within the ingestion EPZ will be referenced in the next revision to the plan; specific duties and responsibilities of counties within the Ingestion EPZ are described in the state Emergency Plan, Appendix A of the St. Lucie Plant Radiological Emergency Plan. A schedule has been provided to indicate the timing of the next revision.
- The Plan does not have a block diagram which illustrates all the Federal and local organizations that are part of the overall response organization for the EPZ. (A.1.c)
- * This diagram appears as Figure 1-2 and is supplemented by Figure 1-4. However, as more information (from the State) becomes available, these figures will be revised.
- The Plan does not have written agreements for all support organizations having an emergency response role within the Emergency Planning Zones. (A.3).
- * These agreements will be provided as indicated in the enclosed schedule.

- There is no discussion in the Plan of the capability to provide 24 hour support of the augmented emergency organizations for an extended period, nor the individual responsible for continuity of resources. (A.4)
- * This is now provided in Section 2 as one of the responsibilities of the Recovery Manager.

B. Onsite Emergency Organization

- The responsibility of the Emergency Coordinator to provide protective action recommendations to offsite authorities should be covered explicitly in the Plan in the listing of responsibilities of this position and also in the listing of responsibilities that cannot be delegated. (B.2 and B.4)
- * This will be described in the next revision.
- There are no conditions given in the Plan for higher level utility officials assuming the function of Emergency Coordinator. (B.3)
- * These conditions are now described in Table 2-1 of the plan.
- The specific emergency assignments for the plant staff members should be described covering the emergency functions and tasks described in Table B-1 of the criteria. The minimum capabilities and staffing onshift and available within 30 minutes and 60 minutes following declaration of an emergency must also be described. (B.5 and Table B-1).
- * This information will appear as a response to NRC letter (from Eisenhut) dated 2/18/81 concerning this subject.
- The Plan does not illustrate, in a block diagram, the interfaces between and among the onsite functional areas of emergency activities and offsite support, including the onsite Technical Support Center

(TSC), the nearsite Emergency Operations Facility (EOF), the Operations Support Center (OSC), and any other emergency centers. (B.6)

- * This is now illustrated in Figure 4-2.
- ° There is no discussion of logistic support for emergency personnel in the Plan. (B.7.a)
- * This is discussed as one of the responsibilities of the Recovery Manager in Section 2.
- ° The Plan does not specify ambulance transportation support. (B.9)
- * This is specified in Section 2.5.4.
- ° The Plan does not include copies of agreement letters for services to be provided by all support agencies. The agreements shall delineate the authorities, responsibilities, and limits on the action of the contractor, private organization, and local services support group. The Plan contains letters of agreement which appear to be out-of-date and/or no longer valid (USNRC-Appendix G, Shands Teaching Hospital- Appendix H, Radiology Associates - Appendix I). These letters should be updated or removed from the Plan. Appendix C of the Plan is Florida Highway Patrol Order No. 25. An agreement letter should be established with the Florida Highway Patrol in accordance with Criterion B.9 of NUREG-0654, Rev. 1, and if desired, Order No. 25 may be appended to the agreement letter. (B.9)
- * See response to NRC Comment (A.3).

C. Emergency Response Support and Resources

- ° Although the Plan designates the person who is authorized to request RAP assistance, it is not made clear where the RAP team would be expected to report or with whom they would maintain contact. Section

4.2.2 of the Plan should be changed with respect to "onsite" assistance from DOE. The Federal Emergency Management Agency (FEMA), in the proposed Master Plan (See Federal Register, Vol. 45, No. 248, December 23, 1980), has designated DOE as having responsibility to coordinate all off-site radiological monitoring, assessment, evaluation, and reporting actities of all Federal agencies during the initial phases of an accident. (C.1)

- * It is understood that the new FRMAP program provides only for DOE to assist with offsite functions and as such would work with the State of Florida Bureau of Disaster Preparedness and Department of Health and Rehabilitative Services. Consequently, DOE assistance will be requested by the state. All references to onsite support by DOE have been deleted from the plan.
- The Plan does not provide for the dispatch of a representative from the licensee to the principal offsite EOC. (C.2.b)
- * This individual will be dispatched at the direction of the Emergency Control Officer and will be discussed in the next revision to the plan.
- The Plan does not describe the general capabilities, expected availability, and analyses services of alternate radiological facilities. (C.3)
- * This is described in a procedure and will be referenced as such in the next revision.
- The Plan does not include letters of agreement for the outside support organizations identified in the Plan, pages 2-6, 2-31 and 2-38. (C.4)
- * See response to NRC Comment (A.3).

D. Emergency Classification System

- ° The emergency action level (EAL) scheme as set forth in Appendix 1 to NUREG-0654 is not established in the Plan. The initiating conditions shall include the example conditions, as applicable, found in Appendix 1, and all postulated accidents in the Final Safety Analysis Report (FSAR). Section 1.4 of the Plan, page 1-8, which states "The Unusual Event class is not an emergency," must be changed in order to comply with Appendix 1 to NUREG-0654 and the reporting requirements of 10 CFR 50.72, and in order to be consistent with the notification actions described in Section 2.1.4 and 4.4.1 of the Plan. As it currently stands, the Plan commits to notifying the NRC within one hour after identifying the existence of an emergency condition, which does not include the Unusual Event class. (D.1,2)
- * Changes to the plan will be made to indicate that the Unusual Event is an emergency and as such, requires notification of the NRC and state and county agencies. The one hour reporting requirement (NRC) is already incorporated throughout the plan (Sections 1 and 2). The State Bureau of Disaster Preparedness will receive initial notification within 15 minutes of declaration of an emergency (This provision will be incorporated in the next revision of the plan).

Where possible, specific emergency action levels have been specified. The example initiating conditions found in the plan adequately cover each emergency class prescribed by NUREG 0654.

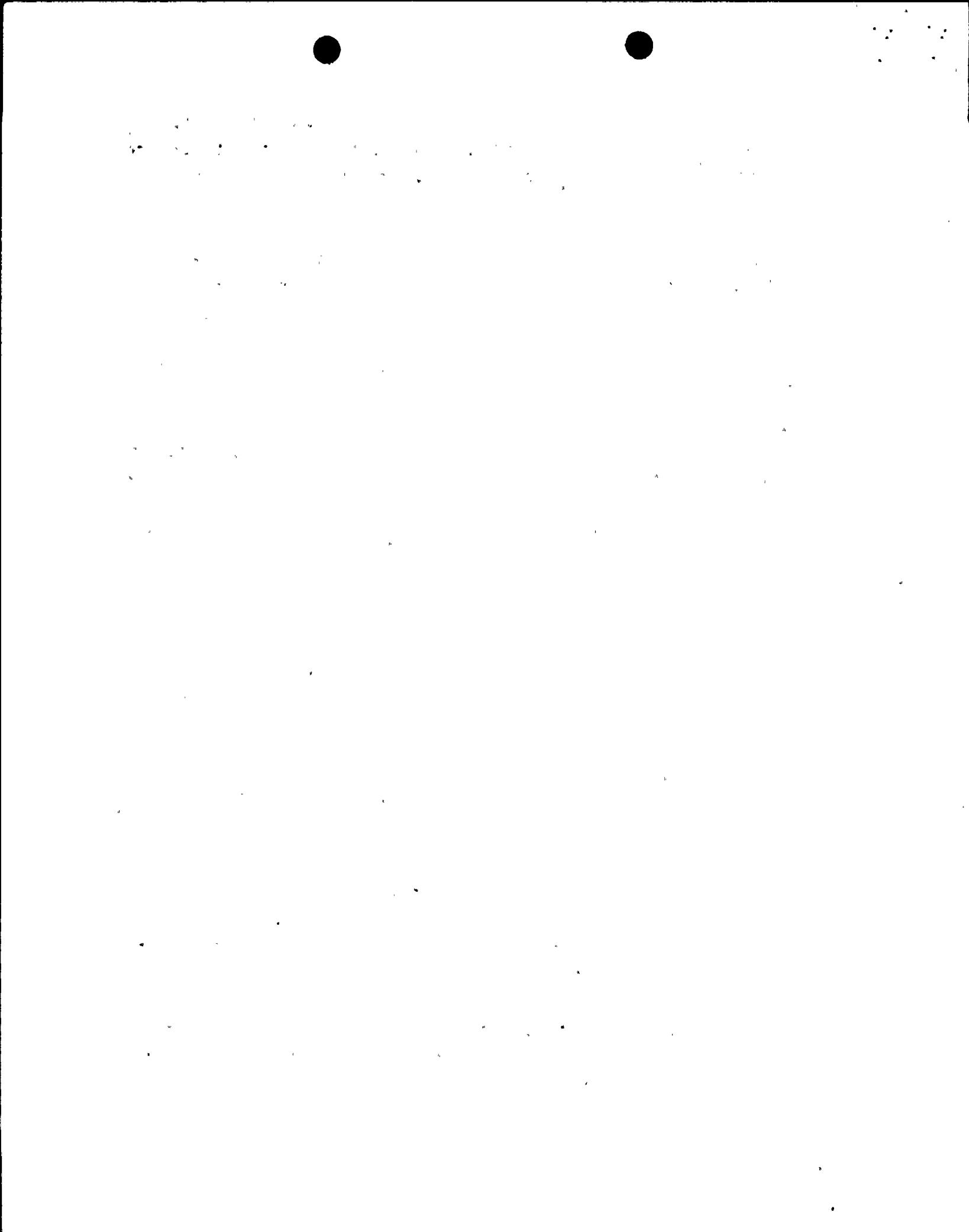
- ° The references to Technical Specifications in the Emergency Action Level Classification scheme, Table 3-2 of the Plan, should be converted to direct instrument readings, and the appropriate Technical Specifications included. (D.1)
- * Where possible, direct instrument readings have been described in Table 3-1. Since baseline instrument readings and alarm setpoints are constantly reviewed and may periodically be changed, these readings will be placed in procedures. Appropriate Technical

Specifications will not be included in the plan. Licensed operators have already received extensive training in this area and the additional material would serve no useful purpose.

- ° Example PWR sequences 5.a through e and 7 on pages 1-18 and 1-19 of Appendix 1 to NUREG-0654, Rev. 1 should be explicitly treated in the Plan. The Plan should state clearly whether the FSAR accidents are in Table 3-2. (D-2)
- * These are adequately covered by Table 3-1. A statement indicating that all FSAR accidents have been discussed will appear in the next revision.

E. Notification Methods and Procedures

- ° There is no discussion in the Plan of the means for verification of messages, other than the Florida Bureau of Disaster Preparedness procedure to authenticate emergency messages from St. Lucie Plant. (E.1)
- * Required verifications (i.e. BDP) are already discussed, to the extent possible, in the plan.
- ° The Plan does not include in the content of initial messages, information regarding potentially affected population and areas, and whether protective measures may be necessary. (E.3)
- * Information regarding wind speed and direction, as well as, radioactive material releases is already provided to the state and county. Provision for recommending protective measures will be included in the next revision of the plan and will be based upon EPA PAG's.
- ° The Plan does not describe the provisions for followup messages from the facility to offsite authorities which contain information including projected integrated dose at the projected peak and at 2,



5, and 10 miles; recommended emergency actions, including protective measures; request for any needed onsite support by offsite support organizations; and prognosis for worsening or termination of event. (E.4.i,1,m,n)

- * Followup messages are now described in section 4 of the plan. Requests for any needed support by offsite organizations and prognosis for worsening or termination of the event is described in Section 4 of the plan. Transmittal of information concerning projected and integrated dose rates and recommended emergency actions will be described in the next revision of the plan.
- The Plan fails to acknowledge the requirement that notification of offsite authorities and the population of the plume exposure pathway EPZ is subject to a 15 minute time constraint. There is, moreover, no documentation of specific prior arrangements that have been made to use public communications media (e.g. radio stations) for issuing emergency instructions to the public. (E.6)
- * Notification to offsite authorities will be made for Unusual Event class or higher within 15 minutes of declaration of the emergency (see sections 4.1, 4.2.1, 4.3 of the Plan). References to the Unusual Event will be included in the next revision. Notification to the population and arrangements with public communications media is described in the State of Florida plan.
- The Plan does not indicate that an Early Warning System meeting the design objectives of Appendix 3 of the criteria has been developed. The Plan should address the administrative and physical means, and the time required to promptly notify the public of an emergency. The Plan should commit to the establishment of such a system and indicate when the system will be implemented. (E.6)
- * The plan will commit to such a system in the next revision. Implementation of the system will be discussed under separate cover.

- The Plan does not address written messages intended for the public, consistent with the licensee's classification scheme. (E.7)
- * These messages are identified in of the state plan.

F. Emergency Communications

- The Plan does not specifically state the provisions for 24-hour per day notification and activation of the State/local emergency response network including 24-hour per day manning of "communication links" (that initiate emergency response actions) are established for the "Unusual Event" and "Alert" categories. (F.1.a)
- * Section 4.2.1 of the plan references the 24 hour per day manning of "communication links". Telephone numbers, where applicable are provided by procedure. Initial notification will normally come from the Control Room which is manned 24 hours per day.
- The Plan does not contain provisions for communications between the various EOC's and the radiological monitoring teams. (F.1.d)
- * The State plan describes these provisions.
- The communications plan does not include organizational titles and alternates for both ends of the communication links. (F.1)
- * Where applicable, these titles will be included in the next revision of the plan.
- There are no provisions in the Plan for a coordinated communication link for fixed and mobile medical support facilities. (F.2)
- * These provisions will be described in the next revision to the plan.

G. Public Information

- ° The Plan does not provide for annual dissemination of information to the public regarding how they will be notified and what their actions should be in an emergency. (G.1) This information should include, but not necessarily be limited to:
 - a. educational information on radiation;
 - b. contact for additional information;
 - c. protective measures, e.g. evacuation routes and relocation centers, sheltering, respiratory protection, radioprotective drugs; and
 - d. special needs of the handicapped.
 - ° The Plan does not provide for a public information program which provides the permanent and transient adult population within the plume exposure pathway EPZ an adequate opportunity to become aware of the information annually. (G.2)
- * Response to (G.1) and (G.2), above:

The public information program is controlled by the state and is described in their plan. FPL will supply technical information to the state as required.

- ° The Plan does not describe the arrangements for timely exchange of information among designated spokespersons. (G.4.b)
- * This will be provided in the next revision to the plan.
- ° The Plan does not address coordinated arrangements for dealing with rumors. (G.4.c)

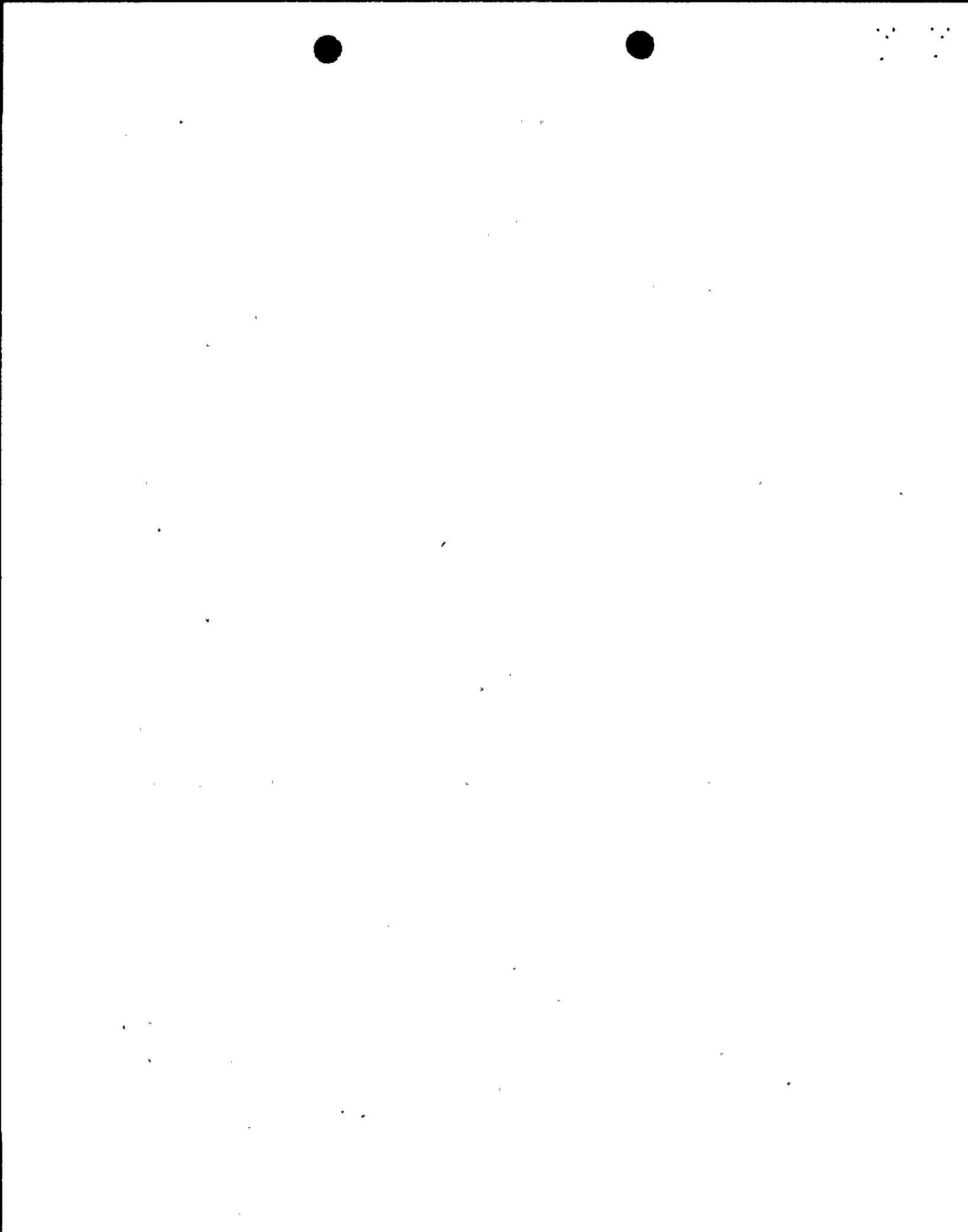
* This will be addressed in the next revision.

H. Emergency Facilities and Equipment

- ° The Plan does not address the functional criteria of NUREG-0696 for the onsite TSC, the nearsite EOF, the Nuclear Data Link and the Safety Parameter Display System. (H.1)
- * These criteria are not required for interim facilities or are not required until 1982. The current version of the plan does not describe these functional criteria. Upon completion of permanent facilities, functional criteria will be addressed.
- ° There is no discussion in the Plan of the time required to staff the centers. Criterion 4, page 52 of NUREG-0654, Rev. 1, requires timely staffing.
- * These centers will be staffed in a timely manner; this will be prescribed in the next revision of the plan.
- ° There is no discussion in the Plan of hydrologic or seismic monitors onsite and offsite, that are to be used to initiate emergency measures in accordance with Appendix 1 to NUREG-0654, Rev. 1. The plan should describe the NOAA seismic equipment referred to in Table 3-2, page 3-14. (H.5.a,H.6)
- * This information is received from NOAA and is described in Table 3-1. NOAA equipment will not be described in the plan since it does not affect emergency response.
- ° There is no discussion in the Plan of wound or portable monitors. (H.5.b)
- * As indicated (through correspondence) by FPL's medical consultants, wound monitors are not required. Any radiological assessment of contaminated wounds will be performed by REEF in Miami. Portable

monitors (contamination and dose rate survey instruments) are described throughout the plan.

- The Plan does not describe the provisions for offsite radiological monitoring equipment in the vicinity of the nuclear facility. (H.7)
- * Within 2 1/2 to 3 hours of notification, the Department of Health and Rehabilitative Services (state) can be in vicinity of the plant performing radiological monitoring, this provision is described in the state plan. Other provisions will be described in the next revision.
- The Plan does not meet the meteorological program of Appendix 2 of NUREG-0654, Rev. 1. (H.8)
- * All current requirements are met.
- The Plan does not provide for an onsite OSC which shall have supplies including respiratory protection, protective clothing, portable lighting, etc., for personnel present in the assembly area. (H.9)
- * These provisions will be described in the next revision of the plan.
- There is no discussion in the Plan of inspecting, inventorying and operationally checking emergency equipment/instruments at least once each calendar quarter and after each use. (H.10)
- * This is now discussed in Section 7.4 of the plan.
- The Plan does not include, in an appendix, identification of emergency kits by general category (protective equipment, communications equipment, radiological monitoring equipment and emergency supplies). (H.11)
- * It is felt that a separate appendix indicating equipment and supplies discussed and described throughout the plan is unnecessary (See Tables 2-3, 2-4, 2-5).

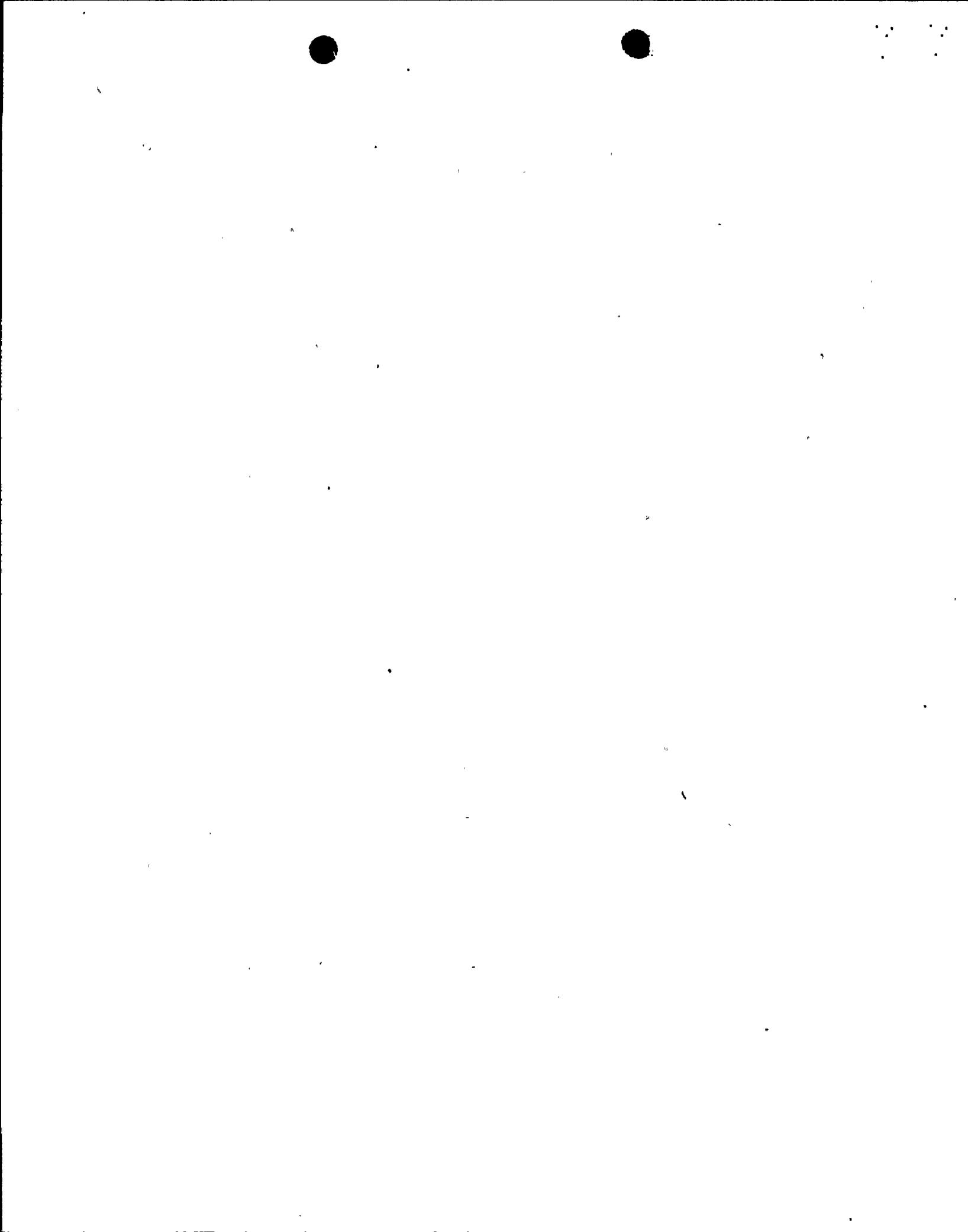


- The Plan does not discuss a central point for the receipt of analysis of all field monitoring data and coordination of sample media. (H.12)
- * This is now discussed in section 5.1.6.

I. Accident Assessment

- Section 5.1.1 of the Plan does not adequately describe the onsite capability and resources to provide initial values and continuing assessment throughout the course of an accident, including post accident sampling capability, radiation and effluent monitoring systems, in-plant iodine instrumentation and containment radiation monitoring in accordance with NUREG-0578 and NUREG-0737. The Plan should provide a table of the monitoring systems, describing location of detectors, type of detectors, range of measurement, alarm set-points, etc. (I.2)
- * The appropriate instrumentation will be described in the next revision, to the extent possible.
- The Plan does not address the methods and techniques (procedures) to be used for determining the source term of potential releases of radioactivity material from additional potential release points such as steam generation blowdown, rad waste vent, laundry facility vent and auxiliary steam-driven boiler feed pump exhaust, as applicable. (I.3.a)
- * These methods and techniques are described in procedures. This will be indicated in the next revision of the plan.
- The Plan does not specify the capability of acquiring and evaluating meteorological information sufficient to meet the criteria of Appendix 2 to NUREG-0654, Rev. 1. There shall be provisions for access to meteorological information by at least the nearsite EOF, the onsite TSC, the Control Room and offsite NRC center. (I.5)

- * The meteorological information is already provided to the Control Room. The other capabilities are not required for interim facilities.
- The Plan has not established the methodology for determining the release rate/projected doses if the instrumentation used for assessment are offscale or inoperable. (I.6)
- * Section 5.1.5 now describes the method to be used for projecting offsite doses for inoperable instrumentation.
- The Plan does not describe the capability and resources for field monitoring within the plume exposure pathway EPZ. (I.7)
- * This is performed by the state DHRS and is described in the state plan. Plant capabilities will be described in the next revision to the St. Lucie Plan.
- The Plan does not describe the methods, equipment and expertise to make rapid assessments of the actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways, including activation, notification means, field team compositions, transportation, communications, monitoring equipment and estimated deployment times. (I.8)
- * Methods, equipment and expertise are covered by procedure. Field team compositions, transportation, etc. are described in the state plan.
- The Plan does not describe the capability to detect and measure radioiodine concentrations in air in the plume exposure pathway EPZ as low as 10^{-7} microcuries per cubic centimeter under field conditions (I.9)
- * This will be discussed in the next revision.



- The Plan does not describe the means for estimating integrated dose from the projected and actual dose rates and for comparing these estimates with the protective action guides. (I.10)
- * Integrated dose estimates are described in section 5.1.5.

J. Protective Response

- The Plan does not discuss evacuation routes and transportation for individuals onsite including alternatives for inclement weather, high density traffic and specific radiological conditions. The Plan does not include maps showing evacuation routes, evacuation areas, pre-selected radiological monitoring points, relocation centers and shelter areas. (J.2 and J.10.a)
- * The next revision will include appropriate maps or figures.
- The Plan does not describe the provisions for radiological monitoring of people evacuated from the site, nor is the decontamination capability at the assembly area for evacuated personnel described in the Plan. (J.3 and J.4)
- * Section 5.2.1 now describes some capability at the Site Assembly area. Further elaboration of these capabilities will be forthcoming (next revision).
- There is no commitment in the Plan for the time required to account for missing individuals (within 30 minutes of the start of an emergency), and for accountability of all individuals continuously thereafter. (J.5)
- * Sections 2.2.2.3 and 5.2.2 of the plan now indicate the estimated 30 minute time constraint which is measured from declaration of an evacuation.

- There is no explicit discussion in the Plan of providing individuals remaining or arriving onsite during an emergency, individual respiratory protection, protective clothing and use of radioprotective drugs. (J.6)
- * Respiratory protection and protective clothing are covered by Health Physics procedures. Radioprotective drugs will only be prescribed by a physician, after exposure. The next revision to the plan will reflect this information.
- The Plan does not contain the time estimates for evacuation within the plume exposure pathway EPZ, in accordance with Appendix 4 to NUREG-0654. (J.8)
- * These estimates appear in of the State plan.
- The Plan does not contain maps showing population distribution around the nuclear facility, nor does the Plan describe the means of notifying all segments of the transient and resident population. (J.10.b and c)
- * The State plan contains this information.
- The Plan does not discuss the means for protecting those persons whose mobility may be impaired due to such factors as institutional or other confinement. (J.10.d)

This is discussed in the State plan.

- The Plan does not describe the bases for the choice of recommended actions from the plume exposure pathway during emergency conditions. (J.10,m)
- * The State plan describes these bases. Further discussion of these bases will appear in the next revision of St. Lucie Plan.

K. Radiological Exposure Control

- The Plan does not describe onsite exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activities Protective Action Guides (EPA 520/1-7S/001) for providing ambulance service and medical treatment services. (K.1.f and g)
- * Although these guidelines are not explicitly defined for ambulance and medical treatment personnel, section 5.3.1 now describes the appropriate guidelines. The next revision will contain a statement clarifying FPL's intent to meet these PAG's for these personnel.
- The Plan does not specify that procedures shall be established, in advance, for permitting onsite volunteers to receive radiation exposures in the course of carrying out lifesaving and other emergency activities. (K.2)
- * Section 5.3.1 sufficiently describes the methodology for permitting onsite volunteers to receive exposures in the course of carrying out lifesaving and other emergency activities.
- The Plan does not provide for assurance that dosimeters are read at appropriate frequencies. (K.3.b)
- * This provision now appears in section 5.3.1.
- The Plan does not specify action levels for determining the need for decontamination of personnel who have become contaminated in the course of an emergency. (K.5.a)
- * Plant Health Physics procedures adequately cover personnel decontamination. The next revision will reference this information.
- The Plan does not describe the means for waste disposal during an emergency. (K.5.b)

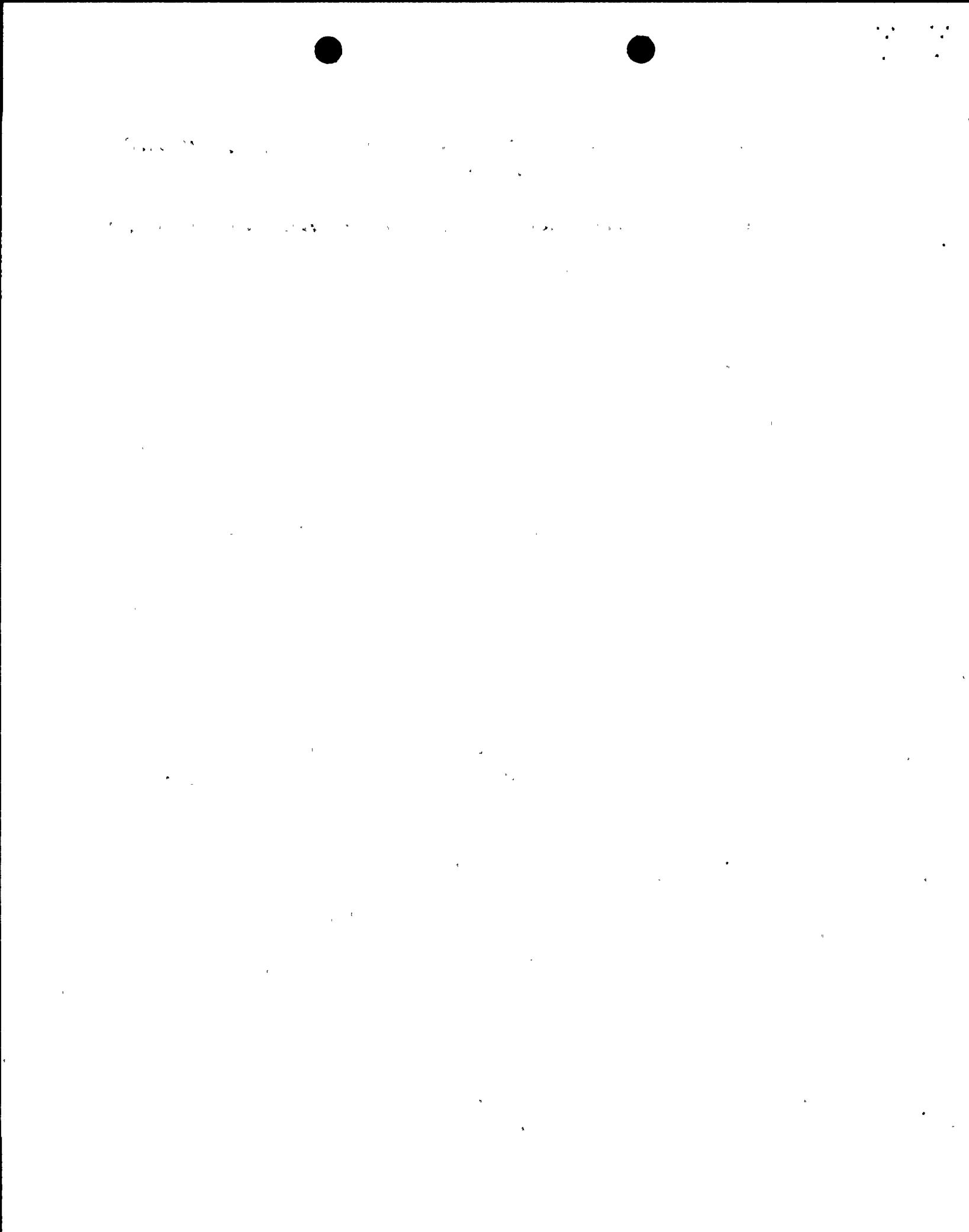
- * Plant procedures are utilized for waste disposal.
- The Plan has not clearly established provisions for onsite contamination control measures for drinking water and food supplies, and criteria for permitting return of areas and items to normal use during an emergency condition. (K.6.b and c)
- * The next revision to the plan will describe contamination control measures for drinking water and food supplies. Criteria for releasing areas from radiological controls is already described in Health Physics procedures.
- The Plan does not describe the capability for decontaminating relocated onsite personnel, including provisions for extra clothing and decontaminants suitable for the type of contamination expected, with particular attention given to radioiodine contamination of the skin. (K.7)
- * Plant Health Physics procedures will address this concern.

L. Medical and Public Health Support

- The Plan does not identify the primary offsite support group for transporting victims of radiological accidents to medical support facilities. (L.4)
- * This group is now described in section 2.5.4.

M. Recovery and Reentry Planning and Postaccident Operations

- There is no discussion in the Plan of the key positions in the facility recovery plan other than the Emergency Control Officer. (M.2)
- * Members of the "recovery organization" are described in the plan as the Emergency Control Officer, Emergency Information Manager,



Governmental Affairs Manager, Recovery Manager, Emergency Technical Manager, and Emergency Security Manager.

- There is no discussion in the Plan of population exposure estimates. (M.4)
- * The State plan discusses this area.

N. Exercises and Drills

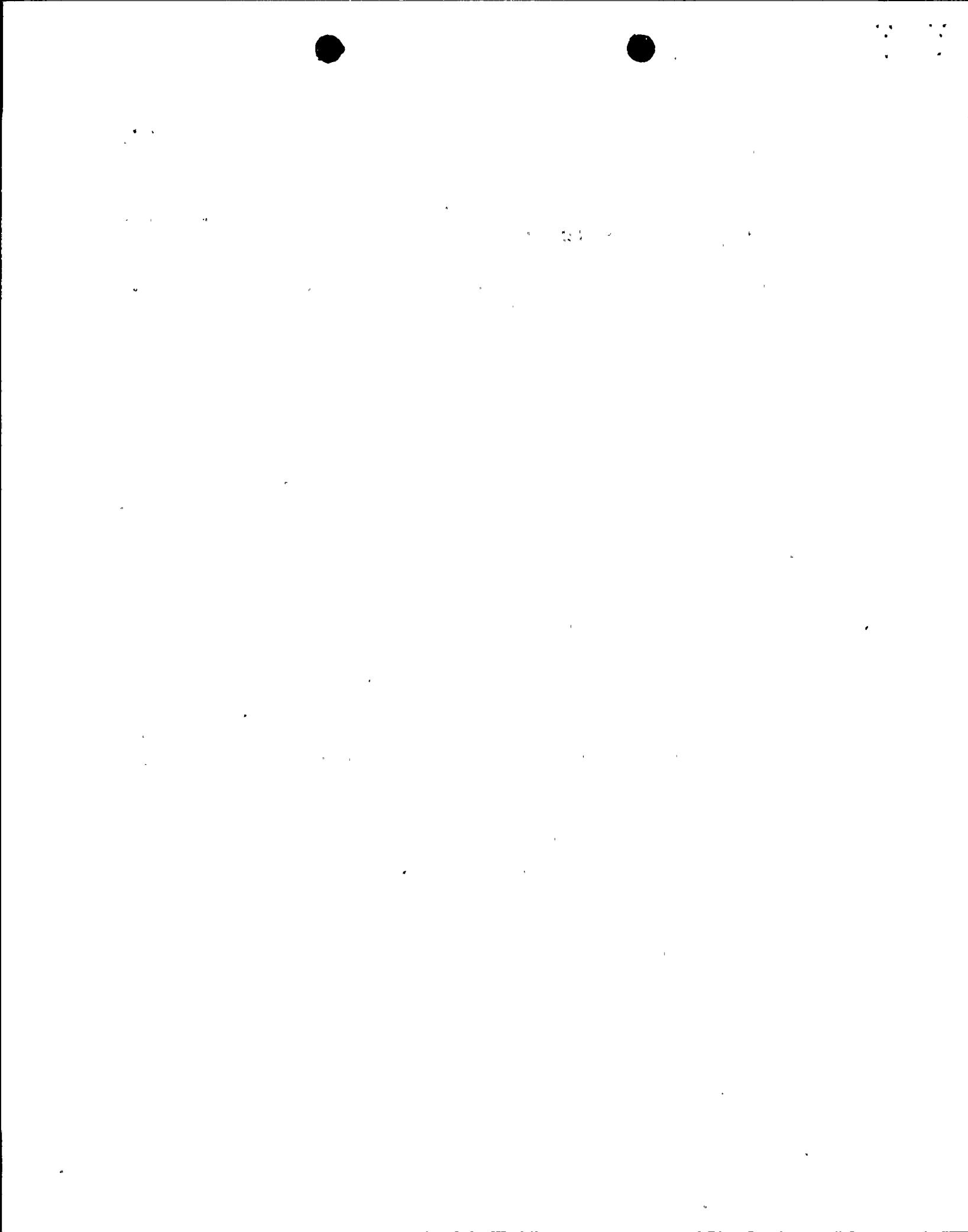
- The Plan does not include varying scenarios from year to year so that all the major elements of the Plan are tested within a five-year period. (N.1.b)
- * A statement clarifying this item appears in section 7.1.4.1.
- The Plan does not specify that communications with Federal response organizations and States within the ingestion exposure pathway EPZ shall be tested quarterly. (N.2.a)
- * This is specified in section 7.1.4.5.
- There is no discussion of communications, between the nuclear facility, State and local EOC's and the field assessment teams, being tested annually. (N.2.a)
- * This appears in section 7.1.4.5 with the exception of field assessment teams which are described in the State plan.
- There is no discussion in the Plan of radiological monitoring drills which involve collection and analysis of offsite vegetation and soil. (N.2.d)
- * This is described in the State plan.

- There is no discussion in the Plan of Health Physics drills involving analysis of inplant liquid samples with actual elevated radiation levels, including the use of the post-accident sampling system. (N.2.e(2))
- * Actual elevated radiation levels will not be used for analyzing and obtaining inplant liquid samples during drills; this is not ALARA. Samples will be taken using the post-accident sampling system and will be handled as if their radiation levels were elevated.
- The Plan does not describe scenarios which will include the simulated events; a time schedule of real and simulated initiating events; a narrative summary describing the conduct of the exercises; and a description of the arrangements for and advance materials to be provided to official observers. (N.3.c, d, e and f)
- * Scenarios will not be provided as part of the plan since this would be counterproductive to exercises and drills. Key elements of scenarios will be included in the next revision of the plan.
- The Plan does not address the assigning of responsibility for implementing corrective actions for those needed improvements identified during the exercise critique. (N.5)
- * This will be described in the next revision to the plan.

0. Radiological Emergency Response Training

- Except for offsite utility personnel, the Plan does not describe the training to be provided for those offsite emergency organizations who may be called upon to provide assistance in the event of an emergency. (0.1.a)
- * A description of the organizations that will be offered training by FPL will appear in the next revision of the plan.

- The Plan does not include on-the-spot correction of erroneous performance during drills as part of the overall training program. (0.2)
- * This will be included in the next revision to the plan.
- The Plan does not describe the program for training and retraining of personnel in the following categories:
 - a. Police and fire fighting personnel:
 - * This will be referenced in the next revision.
 - b. Local support services personnel including Civil Defense/Emergency Service personnel;
 - * This appears as part of the State Plan.
 - c. Medical support personnel;
 - * This will be discussed in the next revision.
 - d. Licensee's headquarters support personnel (the Plan addresses only the Emergency Control Officer , the Emergency Information Officer, and the Emergency Technical Officer); and
 - * All other members of the FPL Offsite Emergency Organization are now addressed in section 7.2.3.
 - e. Personnel responsible for transmission of emergency information and instructions. (0.4.d, g, h, i and j)
 - * This is already discussed in Section 7.2.2 and 7.2.2.2.
- The Plan does not specify annual retraining for offsite FPL and non-licensee personnel with emergency response responsibilities. (0.5)



- * Annual retraining for FPL personnel is now described in section 7.2.2 and 7.2.3.

P. Responsibility for the Planning Effort: Development, Periodic Review and Distribution of Emergency Plans

- ° The Plan does not provide for training of individuals responsible for the planning effort. (P.1)
- * FPL emergency planners receive the majority of their training on-the-job. Other training is received through seminars and meetings held by various industry groups.
- ° The Plan does not specify that the plan and agreements will be updated as needed, reviewed and certified current on an annual basis. (P.4)
- * This is provided in section 7.3.1.
- ° Revised pages of the Plan, dated 1/2/81, are not marked according to Criterion P.5.
- * Changes to the previous submittal were made on almost every page and it was impractical to indicate these changes on the 1/2/81 submittal.
- ° The Plan does not contain a detailed listing of supporting plans and their source. (P.6)
- * This will be provided in the next revision of the plan.
- ° The Plan appendices do not contain a list of the Emergency Plan Implementing Procedures. The listing shall include the section(s) of the Plan to be implemented by each procedure. (P.7)
- * The list was forwarded with the 3/1/81 submittal of procedures. Procedures do not follow specific sections of the plan and it would

be impractical to reference sections of the plan to implementing procedures.

- ° The Plan does not contain a specific table of contents which is cross-referenced according to the criteria contained in NUREG-0654, Rev. 1. (P.8)
- * Cross reference of planning standards to Emergency Plan chapters will be made.
- ° The Plan does not provide for an independent review of the emergency preparedness program at least every 12 months. (P.9)
- * Section 7.3.4 now provides this.
- ° The Plan does not provide for updating telephone numbers in emergency procedures at least quarterly. (P.10)
- * Section 7.3.1 now provides this.

Miscellaneous Comments

1. On page iii of Plan, change Title of Appendix G to "Miscellaneous Letters of Support."
 - * Correction made.
2. Appendix I, on page iii, is listed twice.
 - * Correction made.
3. Appendix J is missing in the Plan.
 - * Now provided.

4. Are there any inhabited islands without ground transportation within the 10-mile EPZ? Provide the documentation justifying the exclusion of the area of extended waterway east of the plant from being part of the plume exposure pathway EPZ. (Reference Fig. 1-1 of the Plan).
 - * Section 1-3 clarifies these concerns. There are no inhabited islands in the 10 mile EPZ. The area of waterway to the east of the plant was not excluded from the EPZ, it just doesn't appear on the map.
5. In first paragraph at top of page 2-9, change reference of Appendix G to Appendix H.
 - * Correction made.
6. Table 2-1 of the Plan lists the line of succession for the Emergency Coordinator. Paragraph c) 1) on page 2-24 describes other individuals who may succeed to the position of Emergency Coordinator. The Plan needs clarification.
 - * Now clarified.
7. In paragraph 2.3.1, page 2-30 of the Plan, change reference of Appendix E to Appendix F.
 - * The section with this reference has been deleted.
8. Figure 2-6, page 2-32 of the Plan does not show the location of the Operations Support Center.
 - * OSC now shown.
9. On page 2-23 of the Plan, change Region I to Region II.
 - * Correction made.
10. On page 2-38 of the Plan, change (ENC) to (OSC).

- * Correction made.
- 11. On page 2-38 of the Plan, clarify the distance from the plant site to the alternate ENC at the Jensen Beach Holiday Inn.
- * Clarification made.
- 12. Revise paragraph 3.1, Unusual Event, on page 3-1 of the Plan. See reviewer's comment pertaining to criterion D.1, 2 of NUREG-0654, Rev. 1.
- * See response to NRC review comment.
- 13. Figure 4-1, St. Lucie Plant Initial Notification Flow, does not include notification of Unusual Event to offsite agencies.
- * Now provided.
- 14. The role of the U.S. Coast Guard in providing "on-site rescue assistance," described in paragraph 4.4.3 of the Plan, needs to be clarified. The agreement letter with the U.S. Coast Guard, dated February 19, 1980, indicates a normal response time of 30-45 minutes from their Ft. Pierce Station.
- * This is now clarified in section 4.4.2.
- 15. The Radio Paging System "beepers" are described on page 4-11 of the Plan for Dade, Broward, Palm Beach and Sarasota Counties. Are beepers also available for St. Lucie and Martin Counties? If so, this should be described in the Plan.
- * This will be clarified in the next revision.
- 16. Provide the implementation schedule for the remote lab facility referred to on page 5-3 of the Plan.
- * The remote lab facility will be implemented by procedure.

17. The second paragraph of Section 5.2.1, on page 5-9 of the Plan, states that control room personnel are in an isolated environment and need protective equipment only if they leave the control room. If there is a fire or smoke in the control room, or if the control room envelope became contaminated with airborne radioactivity, control room personnel may have to don respiratory protective equipment in order to remain in the control room to handle the emergency. This should be clarified.
 - * This is now clarified in section 5.2.1.
18. Section 7.1.4.1 of the Plan specifies, in part, that a major radiological emergency response, held every 12 months, will be conducted as a Site Area Emergency or General Emergency and will provide for the coordination with and participation of off-site emergency response organizations including federal, state and local governments. The Site Area type of emergency exercise does not lend itself to full participation of local and State Organizations, and as such should not be considered for the major exercises. The exercise would normally be expected to be initiated as an Unusual Event or Alert type, and then escalated to a General type. Appendix E to 10 CFR 50, Para IV.F requires a full-scale exercise which tests as much of the licensee, State and local emergency plans as is reasonably achievable without mandatory public participation be conducted. The General Emergency is the only type exercise that would fulfill this requirement and the Plan should be changed accordingly.
 - * The next revision of the plan will address this concern.
19. The reference to Appendix I on page 7-13 of the Plan should be changed to Appendix J.
 - * Correction made.
20. All of the agreement letters predate the effective date of the new rule on emergency preparedness, and, with the exception of the U.S. Coast Guard (2/19/80), are between 2-2 1/2 and 5 years old and should be updated, unless

by May 1st

in Appendix B, Agreement between Florida Power and Light Company and Department of Health and Rehabilitative Services.

* See response to NRC review comment (A.3).