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*Revised  
dlp  
8/4/98*

SUBJECT: Forwards rev 34 to "St Lucie Plant Radiological Emergency Plan," IAW 10CFR50.54(g). Attachment to ltr provides summary of changes incorporated by rev.

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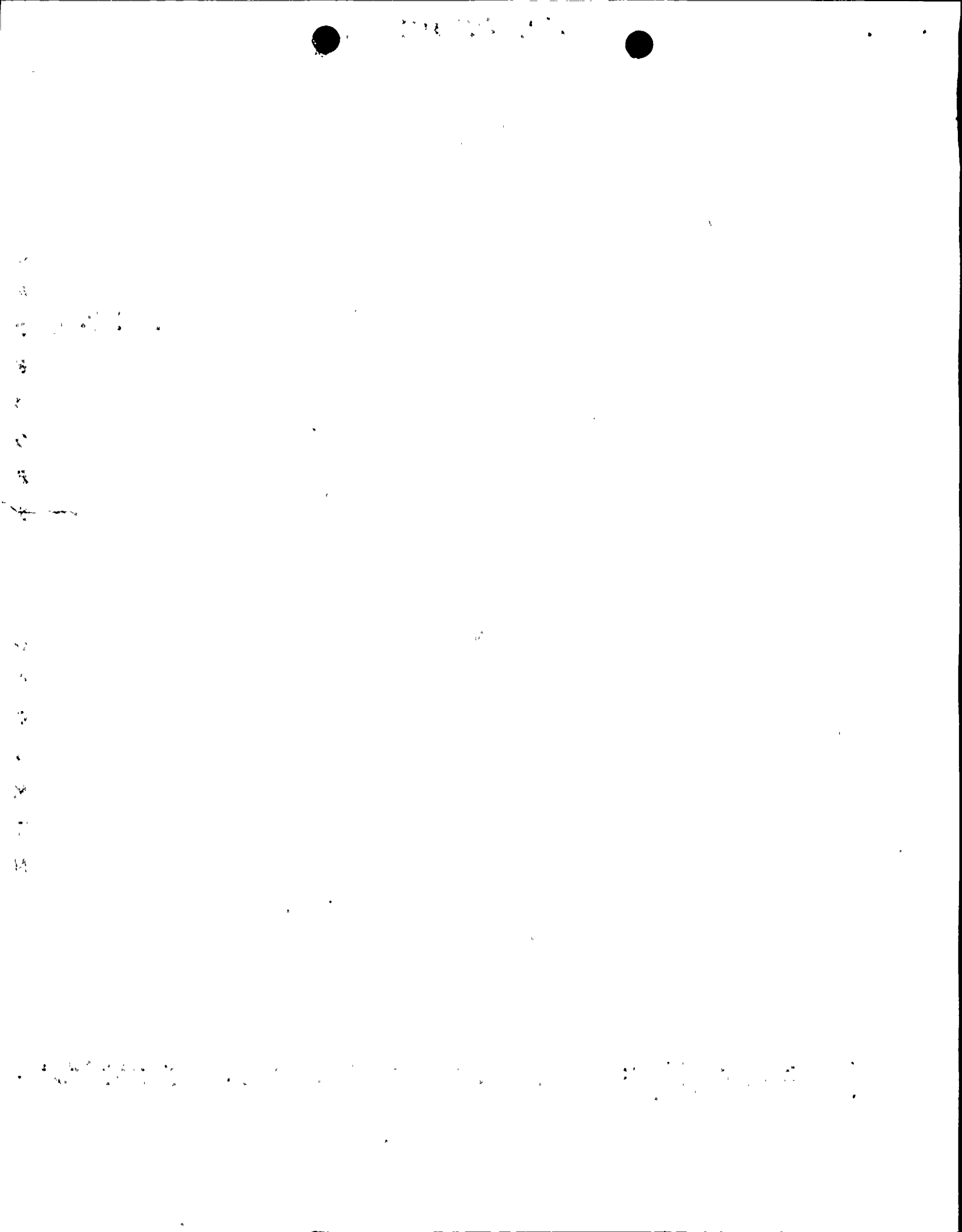
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February 25, 1998

L-97-47  
10 CFR 50.54(q)  
10 CFR 50 Appendix E

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Re: St. Lucie Units 1 and 2  
Docket Nos. 50-335 and 50-389  
Radiological Emergency Plan - Revision 34

In accordance with 10 CFR 50.54(q), enclosed is one copy of the St. Lucie Plant Radiological Emergency Plan revision. Florida Power and Light Company has determined that this revision does not decrease the effectiveness of the plan. In addition, the plan as revised continues to meet the standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50 Appendix E.

Attachment 1 of this letter provides a summary of the changes incorporated by this revision.

Should there be any questions on this revision, please contact us.

Very truly yours,

J. A. Stall  
Vice President  
St. Lucie Plant

JAS/spt

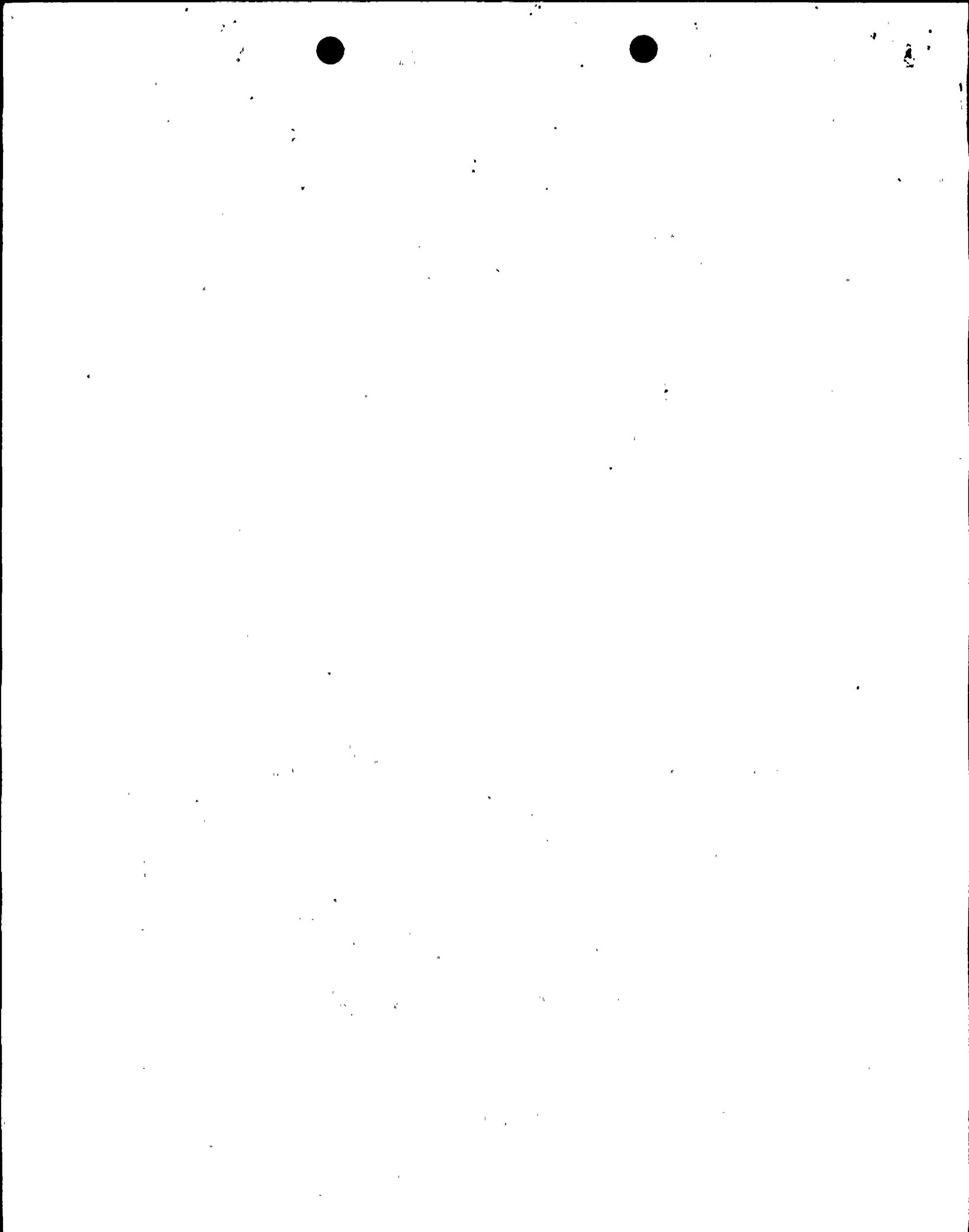
Attachments

cc: Regional Administrator, Region II, USNRC (2 copies)  
Senior Resident Inspector, USNRC, St. Lucie Plant

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## SUMMARY OF CHANGES

### REVISION 34

1. Removed reference to Recovery Manager role in decision making for call-out of the Emergency Response Organization.
2. Revised radiological monitor values (ranges and typical alarm setpoints) based on the Off-site Dose Calculation Manual and Technical Specification required procedures for process monitors.
3. Removed reference to management conference links in the FTS 2000 system, but retained discussion of the Emergency Notification System (ENS) and the Health Physics Network (HPN).
4. Added guidance for recommending protective actions beyond the 10 mile planning basis.
5. Reworded the section on evacuation and accountability and included change in off-site assembly from mandatory to required only for conditions when a release is suspected or occurring.
6. Addressed participation in emergency event by nonpregnant and pregnant adults.
7. Included a paragraph explaining the Emergency Planning Coordinator's assistance to the Services Manager for exercise related activities.
8. Clarified the St. Lucie drill and exercise program for the off-year (non NRC evaluation) situation. This was a violation at Turkey Point and the emergency plans were revised with consistent wording.
9. Clarified the frequency of the independent audit of Emergency Planning Program.
10. Revised the information regarding the update/confirmation of the Letters of Agreement and changed the way the letters would be included in the plan so as to safeguard personal and proprietary information.
11. Revised the listing of Emergency Plan Implementing Procedures to reflect the upgraded/new procedures.



CHANGE DOCUMENT FOR REVISION 34

This document provides a review of the changes incorporated into revision 34 of the St. Lucie Plant Radiological Emergency Plan. This revision is the result of the annual review of the Emergency Plan conducted in December 1997. Minor changes and/or editorial changes are not discussed. An explanation of significant changes is provided, as well as an effectiveness evaluation in accordance with 10 CFR 50.54 (q).

Note: All page and section references apply to Revision 33.

A. General Information (1.0)

1. Page 1-10, Section 1.4, paragraph 1, changed "During the expanded response phase, the Emergency Coordinator and Recovery Manager will assess the situation and expand the Emergency Response Organization as necessary." to "During the expanded response phase, the Emergency Coordinator will assess the situation and expand, as necessary the Emergency Response Organization." This is a change in the notification methods for principal Emergency Response Organization (ERO) as described in the Emergency Plan. The ERO will still be called-out in a timely manner to staff the Emergency Response Facilities as required for the level of emergency. The Emergency Coordinator will now have sole responsibility for call-out of the ERO. The elimination of a decision by the Recovery Manager (RM) in the call-out process does not constitute a reduction in the effectiveness of the Emergency Plan because responsibility for activation of the ERO is still assigned.
2. Page 1-12, Table 1-1, Response Actions, bullet 7, changed "The EC orders mobilization of the Technical Support Center (TSC) and Operational Support Center (OSC) (as required for Alert classification or higher classification and confers with the RM regarding Emergency Operations Facility (EOF) activation)." to "The EC orders mobilization of the Emergency Response Organization as required for Alert classification or higher classification." Refer to A. 1. above.
3. Page 1-14, Figure 1-2, added the Duty Call Supervisor to the call tree. This is a change in notification methods as described in the Emergency Plan. This addition reflects the option of the Emergency Coordinator to delegate responsibility for making off-site notifications. The change does not constitute a reduction in the effectiveness of the Emergency Plan as no notification, previously committed to, has been eliminated nor is it in conflict with the delegation authority of the Emergency Coordinator, as discussed in Section 2.2.2.

B. Organization, Facilities, and Support Services (2.0)

1. Page 2-18, 19, Section 2.2.2, Delegation, (1) paragraph 1, added, "prior to the EOF being declared operational;" (2) changed, "Decision to notify state and local authorities and the content of those notifications." to "Decision to notify off-site organizations and the content of those notifications."; (3) deleted the following Note: "Once the Emergency Operations Facility (EOF) is operational and proper turnover has been conducted, the Recovery Manager will assume responsibility for off-site notifications to the state and local authorities and recommending protective actions."; (4) added "Turnover: Once the Emergency Operations Facility (EOF) is operational and proper turnover has been conducted, the Recovery Manager will assume responsibility for notification of off-site organizations and for recommending protective actions." This is a change in the notification methods as described in the Emergency Plan. This combination of changes strengthens the wording of the Emergency Plan through the elimination of a "note." It does not alter, but rather provides clarification of the transition of the notification process between the Emergency Coordinator and the Recovery Manager and therefore does not constitute a reduction in the effectiveness of the Emergency Plan.
2. Page 2-22, Section 2.2.2.C.8, sentences 3 and 4, changed "Notification of occupants in the Owner Controlled Area will take place during the security sweep of the area. It is estimated that personnel accountability can be accomplished within 30 minutes of declaration of an evacuation by Security." to "It is estimated that personnel accountability can be accomplished within 30 minutes following the declaration of an evacuation by the EC. Notification of occupants in the Owner Controlled Area, outside the Protected Area will be accomplished by security sweeps." This is a clarification to the responsibility for emergency response as described in the Emergency Plan. The declaration of an evacuation is not the responsibility of Security, as may have been implied by the previous wording in the Emergency Plan, but rather is decided by the Emergency Coordinator. Additionally, security sweeps are the means for notification of personnel in that portion of the Owner Controlled Area outside the Protected Area. This change does not constitute a reduction in the effectiveness of the Emergency Plan because the commitment for personnel accountability is unchanged.
3. Page 2-22, Section 2.2.3, paragraph 1, last sentence, changed "Activation of FPL personnel proceeds to the degree necessary, as determined by the EC and Recovery Manager (RM), in response to the severity of the emergency." to "Activation of FPL personnel proceeds to the degree necessary, as determined by the EC in response to the severity of the emergency." Refer to A. 1. above.



4. Page 2-22, Section 2.2.3, paragraph 2, changed "In an Alert, the Technical Support Center (TSC) and the Operational Support Center (OSC) are activated. The RM should place the Emergency Operations Facility (EOF) personnel in the facility for an Alert, as conditions warrant. The EOF shall be activated in a Site Area Emergency and/or General Emergency." to "In an Alert or higher emergency, the Technical Support Center (TSC) and the Operational Support Center (OSC) shall become operational. The Emergency Operations Facility (EOF) shall become operational in a Site Area Emergency and/or General Emergency." Refer to A. 1. above.
5. Page 2-34, Section 2.4.5, paragraph 4, changed "Activation of the Emergency Operations Facility is the responsibility of the Recovery Manager and is required for a Site Area Emergency or General Emergency. The RM should place the emergency response staff on standby in the facility for an Alert." to "The RM is responsible for declaring the EOF operational. The EOF is required to be in operation for a Site Area Emergency or General Emergency, but may go operational for an Alert." As stated in A. 1. above, the Recovery Manager no longer activates the Emergency Response Organization. He does, however, retain the responsibility to declare the EOF operational. This change, therefore, does not constitute a reduction in the effectiveness of the Emergency Plan.

C. Emergency Classification System (3.0)

1. Pages 3-17, 18, Tables 3-2A, B, the "Range in Measurement" values and the "Typical Alarm Setpoint" values for several monitors were revised. This is a change in methods, systems, and equipment used for assessing consequences of an off-site radiological release as described in the Emergency Plan. Maintenance of these monitors is covered by Technical Specification required procedures. These procedures establish ranges and setpoints based on the Off-site Dose Calculation Manual (ODCM). Revision of these values does not constitute a reduction in the effectiveness of the Emergency Plan, but rather a conforming change to remain congruent with the ODCM and changes thereto.

D. Notification and Communication (4.0)

1. Page 4-2, Section 4.1.1.1, paragraph 1, last sentence, changed "Activation of FPL personnel proceeds to the degree necessary, as determined by the EC and Recovery Manager (RM), in response to the severity of the emergency." to "Activation of FPL personnel proceeds to the degree necessary, as determined by the EC in response to the severity of the emergency,". Refer to A. 1. above.



2. Page 4-9, 10, Section 4.6, NRC FTS 2000 Emergency Telecommunications System (NTS), added "Portions of this system are used to contact the NRC, such as the ENS and HPN. These phone links are described below:" and following the description of the ENS and HPN, added "Additionally, this system contains conferencing bridges and access to a Local Area Network (LAN), for use by the NRC Site Team."; deleted descriptions of the Reactor Safety Counterpart Link (RSCL), Protective Measures Counterpart Link (PMCL), Emergency Response Data System Channel (ERDS), Management Counterpart Link (MCL), and the Local Area Network (LAN). This is a change in the communications equipment needed for prompt communications between the principal response organizations and the public as described in the Emergency Plan. The removal of this level of detail is a result of a suggestion from USNRC Region II personnel based on projected changes in this system (most recently the removal of the OCL and MCL from licensees' Technical Support Centers). This change does not eliminate the method(s) of notification of the NRC and therefore does not constitute a reduction in the effectiveness of the Emergency Plan.
3. Page 4-12, Figure 4-2, added "Bell" to all facilities and locations listed in the figure. This is a change in communications equipment needed for prompt communications between the principal response organizations and the public as described in the Emergency Plan. The inclusion of commercial phones (Bell) in this figure is not a change, but actually a clarification of the full range of communications equipment available in these facilities and locations. This change does not constitute a reduction in the effectiveness of the Emergency Plan.

E. Response to Accident Conditions (5.0)

1. Page 5-12, Figure 5-1, added "10-TBD" column. Information has been added to address the possibility for Protective Action Recommendations (PARs) beyond the 10 mile planning basis. This change in protective action guidelines, as described in the Emergency Plan, provides expanded guidance to decision makers and does not constitute a reduction in the effectiveness of the Emergency Plan.
2. Pages 5-14,15,16, Section 5.2.2.2, reworded/revised the entire section. Primarily, the section was restructured to improve comprehension. Key changes:
  - a. Added "unless such action is deemed unwarranted by the EC (i.e., personnel would be placed at greater risk)." This change in protective action guidelines, as described in the Emergency Plan, allows the Emergency Coordinator to use discretion when determining the



appropriateness of evacuation relative to conditions. Adverse conditions could be related to a natural emergency, fire, or security event. The change improves the protective action guidance and therefore does not constitute a reduction in the effectiveness of the Emergency Plan.

- b. Changed "The estimated reaction time (time measured from the time of the accident until the initiation of evacuation - including "hosted" groups) should not exceed 30 minutes. At night or under adverse weather conditions, reaction time should be shortened since fewer persons are on site. Actual evacuation drills have shown that personal accountability can be accomplished within about 30 minutes following declaration of an evacuation." to "An initial list of individuals in the PA is established in 30 minutes and continuously updated until all individuals are accounted for." This change in protective action guidelines, as described in the Emergency Plan, provides a more concise explanation of accountability. This change does not constitute a reduction in the effectiveness of the Emergency Plan since the 30 minute time frame has been retained.
  - c. Changed "all non-essential personnel will evacuate to the appropriate assembly area." to "If a release is in progress and the potential exists for contamination of evacuees, they will be directed to an off-site assembly area." This change in protective action guidelines as described in the Emergency Plan provides a rational alternative for conditions when a release is not in progress. Personnel are checked for contamination at exit monitors in the Security Buildings (as a routine practice) and further monitoring is unnecessary. This change does not constitute a reduction in the effectiveness of the Emergency Plan because under the circumstances of a radiological release since the actions remain unchanged (i.e., personnel report to an off-site assembly area).
  - d. Changed "If radiological conditions warrant an alternative evacuation route, the EC will specify that evacuation proceed south on A1A and he will designate an assembly area." to " The alternate assembly area, south of the plant, is the Jensen Beach Parking Area." This change in protective action guidelines, as described in the Emergency Plan, identifies the actual location of the alternate assembly area. This clarification does not constitute a reduction in the effectiveness of the Emergency Plan.
3. Page 5-19, Section 5.3.1, added new paragraph six, "EPA 400, 'Manual of Protective Action Guides and Protective Actions for Nuclear Incidents,' EPA 400-R-92-001 states, "To assure adequate protection of minors and the unborn during emergencies, the performance of emergency services should be limited

to nonpregnant adults." FPL endorses this guidance; however, FPL recognizes that it is the right of the worker to make the decision to perform as an on-site emergency worker with the understanding of the potential risks involved. This change to the methods used for controlling radiological exposures, as described in the Emergency Plan, more clearly states the FPL commitment to EPA 400. FPL is committed to EPA's protective action guidance, but is also sensitive to the rights of workers. This change does not constitute a reduction in the effectiveness of the Emergency Plan.

4. Page 5-20, Section 5.3.1, deleted "Declared pregnant persons should not be used as "on-site emergency workers"." This change to the methods used for controlling radiological exposures, as described in the Emergency Plan, is the result of a QA concern that FPL was not committed to EPA 400 due to the use of the phrase "Declared pregnant persons should not be used." To ensure no further misunderstanding, this statement has been replaced as discussed in E.3 above.

F. Public Information (6.0)

No significant changes made.

G. Maintaining Emergency Preparedness (7.0)

1. Page 7-2, Section 7.1.3, added new paragraph three "An Emergency Planning Coordinator may complete or coordinate completion of any of the above items. The Services Manager shall retain oversight and accountability through the requirements of EPIP-13, 'Maintaining Emergency Preparedness - Emergency Exercises, Drills, Tests, and Evaluations.'" This change in the drill and exercise program, as described in the Emergency Plan, indicates that an Emergency Planning Coordinator will assist the Services Manager in completion of tasks associated with exercises and drills. As stated elsewhere in the Emergency Plan, the Services Manager may delegate responsibility to an Emergency Planning Coordinator. This change does not constitute a reduction in effectiveness of the Emergency Plan because the Services Manager is still responsible for maintaining emergency preparedness.
2. Page 7-5, Section 7.7.1.4.1, added last two sentences to paragraph one and a new paragraph two, "During the interval between biennial exercises, adequate emergency response capabilities will be maintained by conducting drills, including at least one exercise involving a combination of some of the principal functional areas of emergency response capabilities. The principal functional areas of emergency response include activities such as management and

coordination of emergency response, accident assessment, protective action decision-making, and plant system repair and corrective actions.

During this off-year exercise, activation of all of the emergency response facilities (TSC, OSC, EOF) would not be necessary, there would be opportunity to consider accident management strategies, supervised instruction would be permitted, operating staff would have the opportunity to resolve problems (success paths) rather than have controllers intervene, and the drills could focus on on-site training objectives." This change in the drill and exercise program, as described in the Emergency Plan, clarifies the intent of the St. Lucie Plant drill and exercise program to continue to conduct drills on an annual basis. The previous wording (in Revision 33) did not clearly state how the off-year expectations of the regulation in 10 CFR 50 Appendix E IV.F.2.b. would be satisfied. The St. Lucie Plant drill and exercise program has conducted exercises on an annual basis.

The revised Emergency Plan wording in Revision 30 (July 31, 1996), addressing the change in the regulations to a biennial frequency, did not clearly state that the plant would continue to conduct annual drills. This change is provided for clarification of an annual drill commitment, congruent with the regulations and therefore does not constitute a reduction in the effectiveness of the Emergency Plan.

3. Page 7-16, Section 7.3.5, paragraph one, sentence one, changed "annually" to "once every 12 months." This change in the responsibilities for plan development, review, and distribution, as described in the Emergency Plan, clarifies the frequency of the independent audit of emergency preparedness. The Emergency Plan defines "annual" as once each calendar year which does not accurately describe the frequency of this audit. The FPL Quality Assurance Department conducts an independent audit of the Emergency Planning Program every 12 months. This change clarifies the commitment for this audit in the Emergency Plan and does not constitute a reduction in effectiveness.
4. Page 7-16, Section 7.3.6, paragraph one, deleted "Juno Beach Document Control is responsible for distribution of the Corporate Emergency Plan Implementing Procedures to identified personnel and Emergency Response Facilities." This change in responsibilities for plan development, review, and distribution, as described in the Emergency Plan, eliminates distribution responsibilities from Document Control in the Juno Beach Office. All Emergency Plan Implementing Procedures are produced and distributed by the St. Lucie Plant. This change does not constitute a reduction in the effectiveness in the Emergency Plan because Emergency Plan Implementing Procedures are no longer produced in Juno Beach.

5. Page 7-17, added new section 7.5 Letter Agreements, "Agreements with supporting agencies will be confirmed annually (by direct contact, telephone, or in correspondence). The Letters of Agreements (LOAs) will be updated every third year. Purchase orders/contacts will be renewed as required". This change in available outside agency resources described in the Emergency Plan is a relocation of information previously included in an introductory paragraph of Appendix B. The wording has been revised to provide clarification, but has not changed a commitment and does not constitute a reduction in effectiveness of the Emergency Plan.

H. Appendix A

No significant changes made.

I. Appendix B

1. Page (APP-2), paragraph one, deleted "Agreements with supporting facilities will be confirmed annually (by telephone or in correspondence) with Letter of Agreement being updated every third year in the Emergency Plan." Refer to G.5 above.
2. Page (APP-2), paragraph one, added "To safeguard personal and proprietary information, only the first page (or portion thereof) of each Letter of Agreement is included in this appendix. Complete letters are on file." This change in available outside agency resources described in the Emergency Plan eliminates inclusion of the full text/body of letter agreements so as to protect private information. This change does not constitute a reduction in the effectiveness of the Emergency Plan because the specific agreements in support of the Plan remain the same.

J. Appendix C

1. Page (APP-3), all Emergency Plan Implementing Procedures (EPIPs) have been revised, upgraded, and renumbered. Table 1 to this Attachment is provided as a cross reference of to the old procedures.



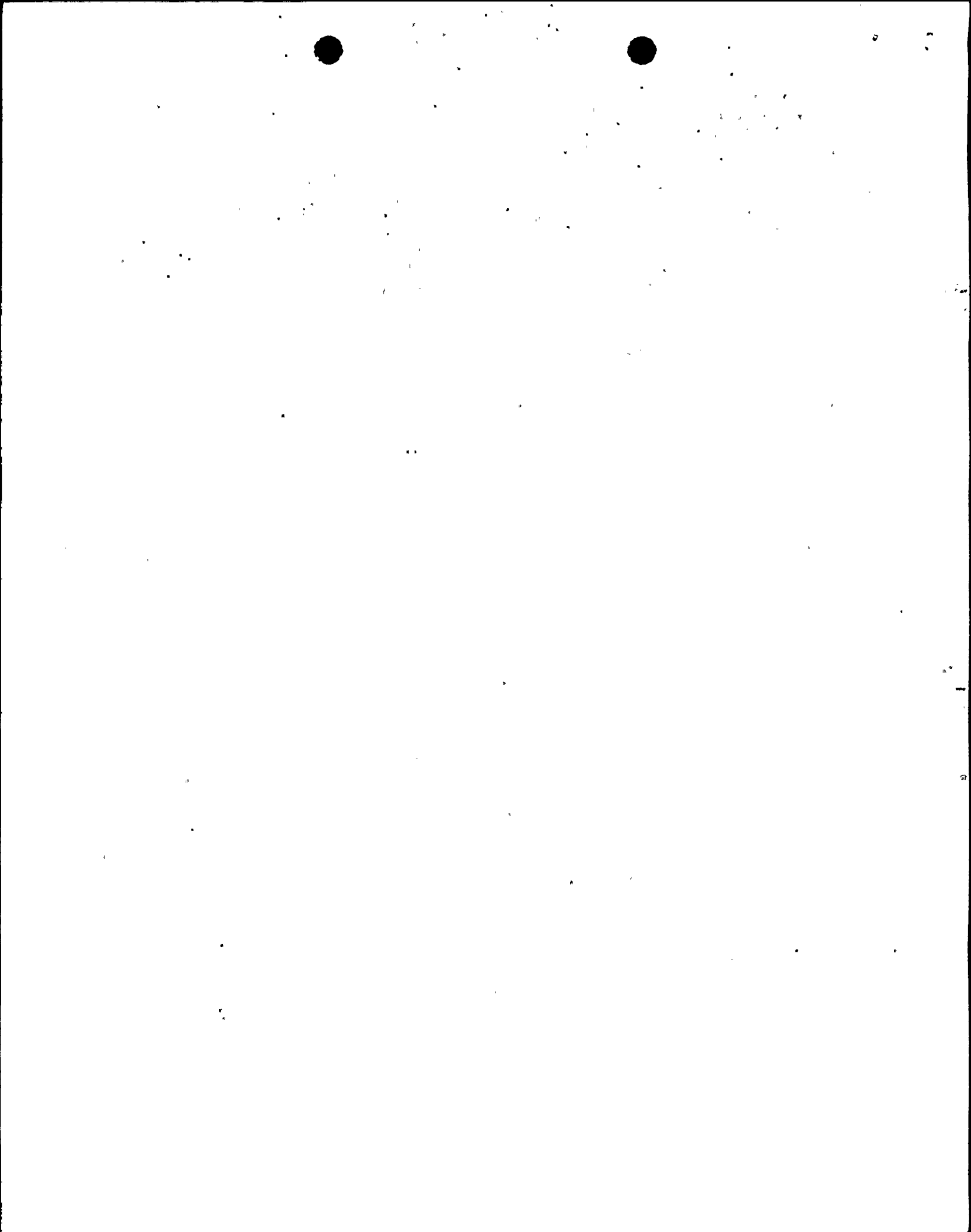


TABLE 1. PROCEDURE CROSS REFERENCE

New Procedure	Old Procedure
EPIP-00 Discovery & Identification of an Emergency Condition (Including Chemical, Fire, and Natural Emergencies)	EPIP 3100024E Natural Emergencies EPIP 3100025E Fire Emergencies EPIP 3100029E Duties of the Individual Who Discovers an Emergency Condition
EPIP-01 Classification of Emergencies	EPIP 3100022E Classification of Emergencies
EPIP-02 Duties and Responsibilities of the Emergency Coordinator	EPIP 3100021E Duties and Responsibilities of the Emergency Coordinator
EPIP-03 Emergency Response Organization Notification/ Staff Augmentation	EPIP 3100023E Site Emergency Organization
EPIP-04 Activation and Operation of the Technical Support Center	EPIP 3100032E On-site Support Centers (in part)
EPIP-05 Activation and Operation of the Operational Support Center	EPIP 3100032E On-site Support Centers (in part) EPIP 3100027E Re-entry
EPIP-06 Activation and Operation of the Emergency Operations Facility	EPP-15 Activation and Use of the Emergency Operations Facility EPP-16 Duties of the Corporate Communications Emergency Response Organization
EPIP-07 Conduct of Evacuation/Assembly	EPIP 3100026E Criteria for and Conduct of Evacuations
EPIP-08 INTENTIONALLY NOT USED	
EPIP-09 Off-site Dose Calculations	EPIP 3100033E Off-site Dose Calculations
EPIP-10 Off-site Radiological Monitoring	EPIP 3100035E Off-site Radiological Monitoring
EPIP-11 Core Damage Assessment	EPP-17 PSL Core Damage Assessment
EPIP-12 Maintaining Emergency Preparedness-Radiological Emergency Plan Training	EPIP 3100034E Maintaining Emergency Preparedness-Emergency Response Plan Training
EPIP-13 Maintaining Emergency Preparedness-Emergency Exercises, Drills, Tests, and Evaluations	EPIP 3100050E Maintaining Emergency Preparedness-Emergency Exercises, Drills, Tests, and Evaluations