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SUBJECT: Forwards rev 36 to "St Lucie Emergency Plan," per
10CFR50.54(q). Executive summary & summary of changes
incorporated by rev, encl.

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Florida Power & Light Company, 6351 S. Ocean Drive, Jensen Beach, FL 34957

May 10, 1999

L-99-104
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 36

In accordance with 10 CFR 50.54(q), enclosed is one (1) copy of the St. Lucie Plant Radiological Emergency Plan, Revision 36, implemented on April 13, 1999. 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 is the Executive Summary. Attachment 2 provides a summary of the changes incorporated by this revision. Attachment 3 is Revision 36 of the Radiological Emergency Plan.

Please contact us with any questions concerning this revision.

Very truly yours,

J. A. Stall
Vice President
St. Lucie Plant

JAS/tlt

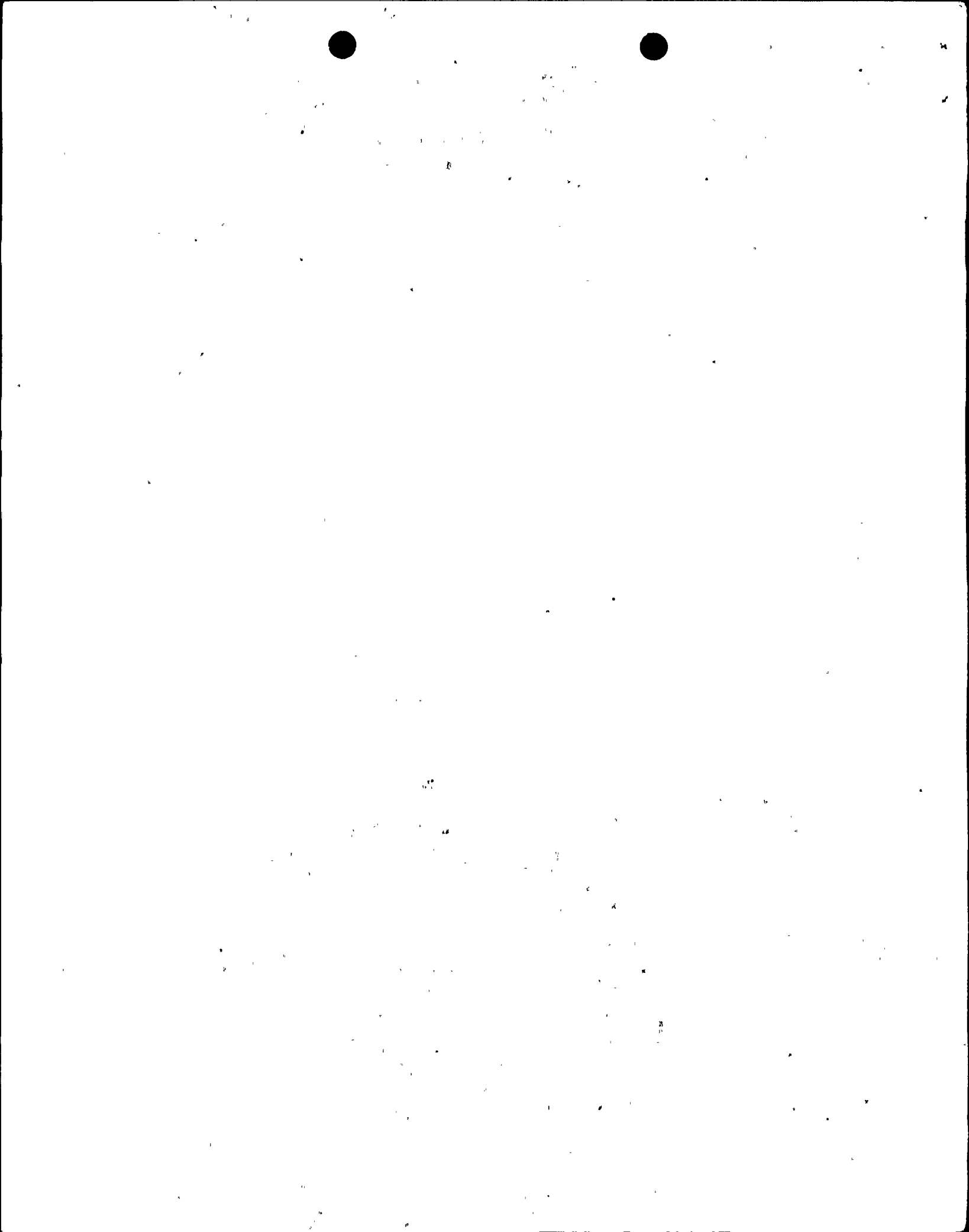
Attachments

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

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EXECUTIVE SUMMARY

Revision 36 to the St. Lucie Plant Radiological Emergency Plan (E-Plan) includes the following key changes to the Emergency Preparedness Program:

1. Responsibility for management of the Emergency Preparedness Program was transferred to the Manager of the Protection Services Department.
2. An additional trained and qualified Emergency Coordinator (EC) alternate was added for more flexibility in staffing this position.
3. Continued dose assessment in the Technical Support Center (TSC) following Emergency Operations Facility (EOF) activation is eliminated. The TSC Chemistry Supervisor is to maintain status of the dose calculation information from the EOF.
4. In an effort to become more common with the Turkey Point E-Plan, additional information was included in this revision (e.g., more detail of off-site medical capabilities). The detail of information previously existed, but was not documented in prior revisions.
5. Several communications changes were included in this revision. The Emergency Broadcast System (EBS) was replaced by the Emergency Alert System and the availability of Radio Amateur Civil Emergency Services (RACES) in the counties was identified.
6. The revised coverage area for the Florida Power and Light (FPL) beeper system was identified.
7. The distinction between an exercise and a drill was defined. This included the requirements for preparation, participation, and evaluation, as well as, the objectives and the extent of play.
8. The reference to Emergency Teams and Emergency Team Roster was discontinued. The emphasis was placed on qualification in the Emergency Response Organization (ERO).

The changes made in Revision 36 do not decrease the effectiveness of the St. Lucie Radiological Emergency Plan. A complete evaluation is provided in the Change Document for Revision 36 (Attachment 2).

CHANGE DOCUMENT FOR REVISION 36

Documentation in support of Revision 36 to the St. Lucie Plant Radiological Emergency Plan includes the following analysis of the changes. Change items considered to be administrative, such as (1) changes in titles, (2) misspellings, (3) errors in reference, (4) other typographical errors, or (5) editorial changes which do not alter/revise the original meaning and/or intent of a sentence or paragraph are not addressed in the analysis. All other changes/revisions are evaluated to ensure (1) there is no decrease in effectiveness and (2) that the E-Plan as changed, continues to meet the planning standards of 10 CFR 50.47(b) and requirements of Appendix E.

The criteria used in this evaluation are taken from Emergency Preparedness Position (EPPOS) on Emergency Plan and Implementing Procedure Changes (EPPOS 4) and are as follows:

- A. Does the change involve a decrease in effectiveness of the E-Plan as determined by an examination of the emergency planning commitments and the bases for those commitments?
- B. Does the E-Plan, as changed, involve a failure to meet any of the sixteen (16) planning standards of 10 CFR 50.47(b) or the requirements of Appendix E to 10 CFR Part 50?
- C. Does this change represent an alternate method or solution to meeting the planning standards or requirements of the regulations than was used in the latest approved E-Plan?
- D. Does this change involve Emergency Action Levels (EALs)? Nuclear Regulatory Commission (NRC) approval is required for any change made to EALs. This criteria is not applicable to this revision.

These criteria will be addressed following each item listed in the Change Document below. Each criterion will be indicated by letter (i.e., A, B, C, and D).

NOTE: All page and section references apply to Revision 35 (previous revision).

A. General Information (1)

1. Page 1-2 Section 1.2 Definition of Duty Call Supervisor (DCS), sentence 1, inserted "and trained" between "designated" and "supervisor".
 - A. This change clarifies that someone designated as DCS must be trained in the responsibilities of the position. This change does not decrease the effectiveness of the E-Plan.
 - B. This change is an improvement to a definition and does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
2. Page 1-2 Section 1.2 Definition of Emergency was changed from "Any off-normal event or condition, which significantly increases the risk of harm to the health and safety of the public and/or site personnel. A radiological emergency at the Plant is classified as a Notification of Unusual Event, an Alert, a Site Area Emergency, or a General Emergency." to "Any off-normal event or condition which is classified into one of the four event categories of Table 3-1, Emergency Classification Table. A radiological emergency at the Plant is classified in accordance with Section 3, Emergency Classification System and Emergency Plan Implementing Procedure EPIP-01, Classification of Emergencies, as an (Notification of) Unusual Event, an Alert, a Site Area Emergency, or a General Emergency."
 - A. This change replaces the previous definition with the basis upon which an emergency is determined in accordance with the E-Plan. This change does not decrease the effectiveness of the E-Plan.
 - B. This change is an improvement to a definition and does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
3. Page 1-2 Section 1.2 Definition of Emergency Coordinator, first sentence, changed from "The title assumed by the Nuclear Plant Supervisor, until relieved by plant management through proper turnover, in the event of a radiological emergency at the plant." to "The title assumed by the Nuclear Plant Supervisor, until relieved by plant management through proper turnover, in the event of emergency conditions at the plant that trigger the Emergency Plan."
 - A. This change clarifies that (1) an emergency can be something other than radiological, and (2) the Nuclear Plant Supervisor (NPS) would not become an EC if the E-Plan were not activated. These changes do not decrease the effectiveness of the E-Plan.
 - B. This change is an improvement to a definition and does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No

4. Page 1-4 Section 1.2 Definition of Operational Support Center (OSC) was changed from "An emergency assembly point at the plant to which FPL operations support personnel can report and await assignment." to "An on-site emergency response facility area where FPL Operations, Maintenance, Health Physics, Security, and Chemistry support personnel can report in an emergency and await assignment."
 - A. This change clarifies that the OSC is not only a gathering location for Operations personnel, but also personnel from Maintenance, Health Physics, Security, and Chemistry. This change does not decrease the effectiveness of the E-Plan.
 - B. This change is an improvement to a definition and does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
 5. Page 1-5 Section 1.2 Definition of Recovery Manager was changed from "A designated company officer or senior manager, who will have responsibility during a radiological emergency of the direction and control of the EOF. He/she has the authority to establish policy and to expend funds necessary to cope with any emergency situations that arise." to "A designated company officer or senior manager, who will have responsibility for the direction and control of the EOF. He/she has the authority to establish policy and to expend funds necessary to cope with emergency situations that trigger the implementation of the Emergency Plan."
 - A. This change clarifies that an emergency can be something other than radiological, but that conditions would have to trigger the implementation of the E-Plan. This clarification does not decrease the effectiveness of the E-Plan.
 - B. This change is an improvement to a definition and does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
- B. Organization, Facilities, and Support Services (2)
1. Page 2-4 Figure 2-1 Top block under the "ON-SHIFT" column was changed from "None" to "As Directed by Emergency Coordinator."
 - A. This change is a clarification of the on-shift capability. The initial EC is filled by the on-shift NPS and therefore would be able to address the emergency function of recovery & restoration should the need arise. This change does not decrease the effectiveness of the E-Plan.
 - B. This change clarifies the on-shift emergency response capability as depicted in the figure and does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No

- D. No
2. Page 2-12 Section 2.2 Deleted "Training Manager" definition.
- A. The responsibility for Emergency Preparedness is being transferred from the Training Manager to the newly created position of Protection Services Manager. The deletion of the definition of the Training Manager's responsibilities and reporting requirements does not decrease the effectiveness of the E-Plan because the Training Manager no longer has management responsibility for Emergency Preparedness.
- B. Responsibility for Emergency Preparedness is being transferred by this revision of the E-Plan. Effectiveness review of this change is discussed below (see # 4). The change does not, however, change the E-Plan regarding any of the planning standards or regulations.
- C. No
- D. No
3. Page 2-13 Section 2.2 Deleted "Health Physics Supervisor" and "Chemistry Supervisor", and added "Health Physics/Chemistry Supervisor".
- A. This is a change in the normal operating organization and does not affect the site ERO. This change, therefore, does not decrease the effectiveness of the E-Plan.
- B. This change reflects a position change in the normal plant operating organization. The identification of this organization, as called for in the planning standards and regulations, remains unchanged.
- C. No
- D. No
3. Page 2-14 Section 2.2 Added the definition for the Protection Services Manager as follows: "The Protection Services Manager manages the areas of Emergency Preparedness, Security and Safety. The Protection Services Manager reports to the Vice President – St. Lucie Plant".
- A. The Protection Services Department is being re-instated to include Emergency Preparedness, Safety and Security. Responsibility for Emergency Preparedness is being transferred from the Training Manager to the Protection Services Manager. The Supervisor of Emergency Preparedness reports to the Protection Services Manager. The Protection Services Manager reports to the Vice President – St. Lucie Plant. The level of management oversight/involvement is the same, as when Emergency Preparedness reported to the Training Manager therefore, this change does not decrease the effectiveness of the E-Plan.
- B. This transfer of responsibility does not change the E-Plan regarding any of the planning standards or regulations.
- C. No
- D. No

5. Page 2-16 Figure 2-3 Combined "Health Physics Supervisor" and "Chemistry Supervisor" on the organizational chart.

A, B, C, and D – refer to B 3 above.

6. Page 2-16 Figure 2-3 Revised the organization chart as follows: (1) changed "Training Manager" to "Protection Services Manager", (2) changed "Training Supervisors" to "Security Supervisors", (3) added "Safety Supervisor".

A, B, C, and D – refer to B 4 above.

7. Page 2-18 Section 2.2, 2 The paragraph under "Line of Succession" was replaced by the content from Table 2-1 which provided the line of succession for the position of EC should the NPS be incapacitated, and also provided for relief of the EC by higher level plant management. The paragraph reads as follows:

"In the event the Nuclear Plant Supervisor is incapacitated, the Emergency Coordinator will be (in order of succession):

1. Assistant Nuclear Plant Supervisor (from the affected Unit)
2. Nuclear Watch Engineer
3. Any other member of the plant staff with an active Senior Reactor Operator license.

It is the responsibility of the new Emergency Coordinator to ascertain the status of all Emergency Coordinator responsibilities prior to assumption of duty. The Emergency Coordinator can grant permission for watch relief, including his/her own, when it is safe in his/her judgement to do so.

The Plant General Manager, Operations Manager, or Operations Supervisor should assume the Emergency Coordinator function from the Nuclear Plant Supervisor following proper turnover. Other Senior Managers who have extensive St. Lucie Plant operating experience and Emergency Coordinator qualifications may assume the Emergency Coordinator function."

And

Last sentence in Table 2.1 changed from "Other senior managers who have extensive St. Lucie Plant operating experience and Emergency Coordinator qualifications may assume the Emergency Coordinator function." to "Other senior managers who have extensive plant or industry operating experience or knowledge and Emergency Coordinator qualifications may assume the Emergency Coordinator function."

- A. This change involves moving the information regarding the line of succession for the EC from a stand-alone table into the body of the text of the E-Plan. Incorporation of this information and elimination of the previous text removes a redundancy and therefore does not decrease the effectiveness of the E-Plan.

And

This change removes the plant specific restriction from the qualification statement,

but replaces it with a requirement for equivalent knowledge or experience. The expected background for personnel filling the position of EC has not been compromised by this change and therefore does not reduce the effectiveness of the E-Plan.

- B. The removal of redundancy nor the revision to the EC qualification statement changes the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
8. Page 2-20 Section 2.2, 2.C.1 Sentence four, added "or another EC-trained person".
- A. This change allows more flexibility in choice of alternates for EC, but does not alter the requirements to qualify for EC, so therefore does not decrease the effectiveness of the E-Plan.
 - B. This addition does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
9. Page 2-20 Section 2.2, 2.C.4 Paragraph two, second sentence changed from "The Chemistry Department will continue to perform dose assessments and compare results with the Recovery Manager's staff's calculations." to "The TSC Chemistry Supervisor will continue to monitor dose assessment results with personnel performing dose calculations in the EOF."
- A. Initial dose assessment will be performed by a representative of the Chemistry Department. There is no change in this responsibility. Once the EOF is declared operational, dose assessment will be performed in that facility. The difference now is that the TSC is not expected to duplicate the effort of the EOF. It may appear that validation of dose calculation results could be compromised by the lack of input from the TSC, but dose calculation results will still be compared against the results obtained by dose assessors from the State of Florida Department of Health and from the NRC. These comparisons can occur remotely or face to face once all parties are co-located. The only change in the method in which dose assessment will be accomplished is the elimination of the duplicate calculations in the TSC. This change does not decrease the effectiveness of the E-Plan because dose assessment will still be performed and a method for validation of results still exists.
 - B. This elimination of duplicate effort does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
10. Page 2-23 Table 2-1 Deleted table, contents transferred to Section 2.2, 2, Page 2-18, under "Line of Succession".

A, B, C, D – refer to B.7 above.

11. Page 2-28 Section 2.2, 4 "Lines of Succession" paragraph, changed "Training Manager" to "Protection Services Manager".

A, B, C, and D – refer to B. 4 above.

12. Page 2-30 Figure 2-5 Dash line expanded to include the Recovery Manager.

A. This change clarifies that the Recovery Manager position, although notified at an Alert, is associated with the off-site response organization which is required at a Site Area Emergency or General Emergency. This change does not decrease the effectiveness of the E-Plan.

B. This clarification does not change the E-Plan regarding any of the planning standards or regulations.

C. No

D. No

13. Page 2-39 Section 2.5, 1 After paragraph two, the following paragraphs were added:

"Both of these medical facilities are equipped and staffed with physicians and nurses capable of treating a contaminated injured individual(s). The physicians will provide for medical examinations, treatment, and laboratory services for those employees and other persons, designated by Florida Power & Light Company, who have been involved in a radiation accident."

The patient receiving areas are equipped for patient decontamination and the performance of emergency medical procedures for life-saving purposes. Additionally, these facilities have intensive care units available for the treatment of decontaminated radiation accident casualties or persons who have received only internal radiation exposure. Both facilities are available on a 24-hour basis."

A. This addition provides additional information regarding the off-site medical support facilities. This change does not decrease the effectiveness of the E-Plan because no change was made in off-site medical support.

B. This addition does not change the E-Plan regarding any of the planning standards or regulations.

C. No

D. No

14. Page 2-39 Section 2.5 Added paragraph 2.5, 3 titled "Communications", and reads as follows: "When injured personnel are transported to an off-site medical facility by county ambulance, radio contact, as well as telemetry, is normally maintained between the facility and the ambulance. In accordance with procedures, telephone notification is made by the Plant to the medical facility concerning the pending arrival of an injured person(s)."

A. This addition provides information about communications associated with transport

of an injured person off-site. This is not a change in communications capability, but has not previously been included in the E-Plan. This change does not decrease the effectiveness of the E-Plan.

- B. This new information detail does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
- C. Notification and Communication (4)
- 1. Page 4-1 First paragraph, last sentence, changed from "Table 4-1 presents the organizational titles and alternates for the primary response organizations communications links." to "Table 4-1 presents the organizational positions and alternates for the primary response organizations responsible for ensuring the manning of communications links."
 - A. This change and those identified for Table 4-1 below (C.9), serve to clarify the information provided in the table. This change does not decrease the effectiveness of the E-Plan.
 - B. This clarification does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
 - 2. Page 4-2 Section 4.1 Added new paragraph 4.1, 1.3 to read as follows: "Once the Emergency Operations Facility (EOF) is declared operational the Recovery Manager (RM) assumes the responsibility for notification of off-site governmental agencies."
 - A. The responsibility of the RM for off-site notifications, which is addressed elsewhere in the E-Plan, is also appropriately included here. This change does not decrease the effectiveness of the E-Plan.
 - B. This reiteration of responsibility does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
 - 3. Page 4-3 Section 4.2, 1 First paragraph, sentence one, added "to the Duty Officer at the State Warning Point in Tallahassee".
 - A. This addition clarifies to whom the fifteen (15) minute notification will be made. This change does not decrease the effectiveness of the E-Plan.
 - B. This clarification does not change the E-Plan regarding any of the planning standards or regulations.

- C. No
 - D. No
4. Page 4-3 Section 4.2.1 Second paragraph, added the last sentence to read as follows: "Follow-up messages may come from the Technical Support Center (TSC), if operational, or the Emergency Operations Facility (EOF), if operational."
- A. This change provides additional information regarding follow-up messages and the role of the TSC and EOF. This change does not decrease the effectiveness of the E-Plan.
 - B. This additional information does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
5. Page 4-3 Section 4.2, 1 Fourth paragraph, added the last sentence to read as follows: "The Hot Ring Down and ESATCOM systems are restricted circuits under control of the DEM and local government."
- A. This change provides additional information regarding the communications systems used for off-site notifications. Because the systems themselves remain the same, this change does not decrease the effectiveness of the E-Plan.
 - B. This additional information does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
6. Page 4-6 Section 4.3 Paragraph two, added sentence three to read as follows: "When the emergency notification is by commercial telephone, he/she is responsible for verifying the message from the Plant by a callback procedure and informing the County Directors that the message has been verified."
- A. This information provides clarification of the method used to "authenticate emergency notification from the St. Lucie Plant" as stated earlier in this section. This change does not decrease the effectiveness of the E-Plan.
 - B. This clarification does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
7. Page 4-6 Section 4.3 Paragraph four, last sentence changed from "... facsimile, police and fire radio networks, and telephone." to "... facsimile, police and fire radio networks, telephone, and RACES (Radio Amateur Civil Emergency Services)."

- A. This addition clarifies the communications capability available in County EOCs. This change does not decrease the effectiveness of the E-Plan.
 - B. This information does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
8. Page 4-8 Section 4.6 Paragraph three changed from "Telephones in the ITN system may be interconnected to the Radio Paging System. This system is capable of reaching beepers located within FPL's service area from Sebastian Inlet to Tavernier. Beepers are regularly assigned to key personnel in the Emergency Response Organization as shown on the emergency roster." to "Telephones in the ITN system may be interconnected to the Radio Paging System. This system is capable of reaching beepers located with FPL's service area form Sebastian Inlet to Miami-Dade County/Monroe County line. Beepers are regularly assigned to key personnel in the Emergency Response Organization as shown in the Emergency Response Directory (ERD)."
- A. (1) This change reflects a reduction in the coverage area of approximately fifteen (15) miles. This change does not however, reduce the coverage within the residential area of the St. Lucie ERO or other locations frequented by ERO members. This change does not negatively impact those members of the ERO who would be expected to promptly respond to an emergency, and therefore does not decrease the effectiveness of the E-Plan. (2) The emergency roster has been replaced by the ERD. This change also does not decrease the effectiveness of the E-Plan.
 - B. Neither the reduction in beeper coverage area nor the roster replacement changes the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
9. Page 4-11 Table 4-1 Initial paragraph changed from "The following positions (with appropriate organization titles) are responsible for manning communication links among the listed organizations/facilities:" to " The following positions are responsible to ensure the manning of communication links for the listed organizations/facilities:"
- A. This change clarifies the intent of the table and does not decrease the effectiveness of the E-Plan.
 - B. This clarification does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
10. Page 4-11 Table 4-1 Deleted alternates, previously listed under lines 3 – 6 and added in "As defined in the State Plan".

- A. Lines 3 – 6 on Table 4-1 address State and County communications responsibilities. Primary responsibility is still identified in the table. Information regarding alternates, for which detail is provided in the State Plan, can be found in that document. Referencing the State Plan for alternate information does not decrease the effectiveness of the E-Plan.
 - B. Referencing the State Plan for alternates does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
- D. Response to Accident Conditions (5)
- 1. Page 5-3 Section 5.1, 3 New paragraph three added to read as follows: "As indicated in Table 5-1, values of the key meteorological parameters are provided for by the St. Lucie Plant meteorological tower. These readouts are provided continuously and the data are directly available at the Control Room, Technical Support Center (TSC), and the Emergency Operations Facility (EOF) via the Emergency Response Data Acquisition and Display System (ERDADS)."
 - A. This new paragraph clarifies where meteorological data is available. This change does not decrease the effectiveness of the E-Plan.
 - B. This clarification does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
 - 2. Page 5-6 Section 5.1, 5 Paragraph two, sentences five and six changed from "Refined dose estimates would be prepared by the Chemistry Department representative who reports to the Technical Support Center or by dose assessment personnel in the Emergency Operations Facility (if operational). Refined dose estimates may be performed using EPIP-09 or using a Class A computer model which utilizes dose factors from EPIP-09." to "Initial dose estimates would be prepared by the Chemistry Department representative who reports to the Technical Support Center. Refined dose estimates would be performed by dose assessment personnel in the Emergency Operations Facility, when operational. Dose estimates may be performed using EPIP-09 or using a Class A computer model which utilizes dose factors from EPIP-09."

A, B, C, and D – refer to B. 9 above.
 - 3. Page 5-16 Section 5.2, 2.3 Added new paragraph three to read as follows: "The EC (RM when the EOF is operational) will recommend offsite protective actions based on the criteria shown in Figure 5-1, Protective Action Recommendations."
 - A. This new information provides an appropriate reference (Figure 5-1) for the material discussed in this section. This change does not decrease the effectiveness of the E-Plan.

- B. This reference does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
4. Page 5-18 Section 5.2, 8 Last sentence was changed from "Emergency Broadcast System (EBS)" to "Emergency Alert System (EAS)".
- A. The EBS has been replaced by the EAS. This change revises the information in this section to reflect the EAS. The EAS replaces the EBS (refer to C below) and therefore does not decrease the effectiveness of the E-Plan.
 - B. The EAS is being used in place of the EBS in the State of Florida. This replacement does not change the E-Plan regarding any of the planning standards or regulations.
 - C. This change provides an alternate method for meeting a planning standard. The EBS was originally approved for public notification of emergency information. The EAS has now been approved by the Federal Communications Commission and the Federal Emergency Management Agency (FEMA) to replace the EBS for this function. As stated in A above, this change does not decrease the effectiveness of the E-Plan.
 - D. No
5. Page 5-22 Section 5.3, 3 Last sentence was changed from "Plant Health Physics procedures specify that decontamination of uninjured personnel must be attempted at contamination levels greater than 1,000 dpm/100cm²." to "Decontamination of uninjured personnel must be attempted at contamination levels greater than minimum detectable activity as defined in Health Physics procedures."
- A. This change deletes the specific activity level for decontamination of an uninjured person. This detail is not required in the E-Plan. The guidance in the procedures triggers on or about the same value (i.e., 100 cpm above background which is at or about the value of 1,000 dpm/100 cm²). The intent of the original sentence remains unchanged; therefore, does not decrease the effectiveness of the E-Plan.
 - B. This deletion does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
6. Page 5-25 Figure 5-2 Added the label "Jensen Beach Parking Area Off-site Assembly Area".
- A. The alternate off-site assembly area, as discussed in Section 5.2.2.2, has been added to the figure of site evacuation routes which currently shows only the site of the primary off-site assembly area. This change does not decrease the effectiveness of the E-Plan.

B. This addition to the figure does not change the E-Plan regarding any of the planning standards or regulations.

C. No

D. No

E. Public Information (6)

1. Page 6-4 Section 6.2, 3 First paragraph was changed from "Florida Power & Light Company and the Division of Emergency Management conduct an annual program to acquaint the news media with the emergency plans, information concerning nuclear power and points of contact for release of public information in an emergency." to "Florida Power & Light Company, in cooperation with the State of Florida and the risk counties, conducts an annual program to acquaint the news media with the emergency plans, information concerning nuclear power and points of contact for release of public information in an emergency."

A. This change clarifies the involvement of both the State and local governments in the annual Media Day. This change does not decrease the effectiveness of the E-Plan.

B. This clarification does not change the E-Plan regarding any of the planning standards or regulations.

C. No

D. No

2. Page 6-4 Section 6.3 Added initial paragraph to read as follows: "FPL will coordinate information exchange with State and County officials. This coordination will include awareness of media releases." Also added a final sentence to paragraph two, "Section VI of Annex G of the State Plan also discusses Rumor Control."

A. Both of these additions (1&2) improve the information provided in this section. These changes do not decrease the effectiveness of the E-Plan.

B. These improvements do not change the E-Plan regarding any of the planning standards or regulations.

C. No

D. No

3. Page 6-7 Table 6-3 Press statement changed from:

"HUTCHINSON ISLAND – Florida Power & Light Company has announced that a Site Area Emergency was declared at St. Lucie Nuclear Power Plant. At (a.m./p.m.), all non-essential personnel were ordered to evacuate the plant site.

Option 1 (radiation release)

Monitoring equipment at the plant has detected (small/additional) amounts of radiation being released to the atmosphere as a result of the present situation at Unit # _____. The nature

and cause of the release is being investigated and further details are not available at the present time.

Option 2 (no radiation release)

Officials called for the evacuation of employees as a precautionary measure due to (insert plant specific data, if known). The cause and nature of the problems are being investigated and further details are not available at this time. No radiation releases have been detected as a result of the situation at Unit # _____.

The plant is continuing shutdown procedures and emergency cooling of the reactor core is continuing. Persons in the immediate vicinity of the plant should continue to monitor radio and television broadcasts for the latest information."

to:

"HUTCHINSON ISLAND – Florida Power & Light Company has announced that a Site Area Emergency exists at the St. Lucie Nuclear Power Plant. At _____ (a.m./p.m.), all plant employees, except those with emergency response duties, were ordered to evacuate the plant site.

Plant officials called for the evacuation of non-emergency employees as a precautionary measure due to (insert plant specific data, is known). There are still approximately 90 personnel remaining on the plant site located in the Control Rooms, Technical Support Center, and Operational Support Center. This includes plant management, operators for both Units, and personnel from Health Physics, Chemistry, Maintenance, and Engineering departments. The cause and nature of the problem are being investigated and further details are not available at this time.

Option 1 (radiation release)

Monitoring equipment at the plant has detected (small/additional) amounts of radiation being released to the atmosphere as a result of the present situation at Unit # _____.

Option 2 (no radiation release)

No radiation releases have been detected as a result of the situation at Unit # _____.

The plant is continuing shutdown procedures and emergency cooling of the reactor core is continuing. Persons in the immediate vicinity of the plant should continue to monitor radio and television broadcasts for the latest information."

- A. This change clarifies the number and location of personnel remaining on-site following site evacuation. The change does not decrease the effectiveness of the E-Plan.
- B. The clarification does not change the E-Plan regarding any of the planning standards or regulations.
- C. No
- D. No

F. Maintaining Emergency Preparedness (7)

1. Page 7-1 Section 7.1, 3 Paragraph one changed from "The Florida Power & Light Company Training Manager will be responsible for the planning, scheduling, and coordinating of major emergency drills or exercises involving off-site agencies. A sample format for drill and exercise scenarios appears in Table 7-1. All exercises and drills involving the plant are subject to the approval of plant management." to "The Protection Services Manager will be responsible for the planning, scheduling, and coordinating of exercises involving off-site agencies. A sample format for exercise scenarios appears in Table 7-1. All exercises and drills involving the plant are subject to the approval of plant management."

A. The change identifies the change from Training Manager to Protection Services Manager (which was discussed above in B. 4) and addresses the distinction between a drill and an exercise and is consistent with Section 7.1.1. This change does not decrease the effectiveness of the E-Plan.

B. This change does not change the E-Plan regarding any of the planning standards or regulations.

C. No

D. No

2. Page 7-2 Section 7.1, 3 changed from:

"When an exercise is to be conducted, the Training Manager will:

1. Schedule a date for the exercise in coordination with the primary State and County emergency response agencies.
2. Coordinate all FPL efforts with other participating personnel, organizations, and agencies.
3. Obtain the approval of the plant management.
4. Offer Federal, State, and local officials the opportunity to observe the exercise.
5. Discuss and evaluate the exercise with observers and principal participants.
6. Ensure that for all identified deficiencies, corrective measures are recommended.
7. Prepare and retain documentation for record keeping.

When an exercise or a major drill is to be conducted, plant management will assure that the following is accomplished:

1. Assign personnel to prepare a scenario.
2. Assign personnel to assist in control and evaluation of the exercise.
3. Coordinate all activities that involve off-site personnel, organizations, or agencies.
4. Schedule a date for this activity and assign observers.

5. Review evaluations of the exercise or drill with the observers and the Facility Review Group.
6. Ensure that deficiencies that are identified are addressed with corrective measures.
7. Prepare and submit documentation in accordance with plant procedures.

An Emergency Planning Coordinator may complete or coordinate completion of any of the above items. The Training Manager shall retain oversight and accountability through the requirements of EPIP-13, Maintaining Emergency Preparedness – Emergency Exercises, Drills, Tests and Evaluations.”

to:

“When an exercise is to be conducted, the Protection Services Manager, in conjunction with plant management, will:

1. Schedule a date for the exercise in coordination with the primary State and County emergency response agencies.
2. Obtain the approval of plant management.
3. Coordinate all FPL efforts with other participating personnel, organizations, and agencies.
4. Offer Federal, State, and local officials the opportunity to observe the exercise.
5. Assign personnel to prepare a scenario.
6. Assign personnel to assist in control and evaluation of the exercise.
7. Discuss and evaluate the exercise with observers and principal participants.
8. Ensure that for all identified deficiencies, corrective measures are recommended.
9. Review evaluations of the exercise with the Facility Review Group.
10. Prepare and submit documentation in accordance with plant procedures.

An Emergency Preparedness Coordinator may complete or coordinate completion of any of the above items. The Protection Services Manager shall retain oversight and accountability through the requirements of EPIP-13, “Maintaining Emergency Preparedness – Emergency Exercises, Drills, Tests and Evaluations.”

These exercises will simulate emergency conditions and may be scheduled such that two or more drills are conducted simultaneously. The Protection Services Manager will normally notify the off-site emergency response organizations and agencies at least 30 days in advance of the scheduled date of an exercise.”

- A. This change identifies the change from Training Manager to Protection Services Manager (which was discussed above in B. 4) and consolidates all items into one list and eliminates duplication. Additionally, a new paragraph is added to this section. This paragraph is relocated from Table 7-1 and fits more appropriately here. These changes do not decrease the effectiveness of the E-Plan.

- B. Neither the consolidation of items nor the relocation of the paragraph changes the E-Plan regarding any planning standards or regulations.
 - C. No
 - D. No
3. Pages 7-3 and 7-4 Table 7-1 (1) Line 1 deleted "drill or", (2) Line 5 deleted "or drills", and (3) last paragraph moved to section 7.1, 3.
- A. Changes (1) and (2) further clarify the distinction of a drill and an exercise. Since an exercise is composed of one or more drills, a drill scenario will not be as formal as that suggested in the table. Change (3) involves relocating a paragraph from the table to Section 7.1.3 (see F.2, above). None of these changes decreases the effectiveness of the E-Plan.
 - B. Changes (1), (2), and (3) do not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
4. Page 7-5 Section 7.1, 4.1 Paragraph one was changed from "A major radiological emergency response exercise will be conducted at least once every two calendar years to demonstrate the effectiveness of the Emergency Plan. This exercise will be conducted as a Site Area Emergency or General Emergency." to "A radiological emergency response exercise will be conducted at least once every two calendar years to demonstrate the effectiveness of the Emergency Plan. Any exercise that will provide for coordination with and participation of off-site emergency response personnel, organizations, and Agencies including those of Federal, State, and local governments will escalate to a Site Area Emergency or General Emergency. The exercise scenario will be varied from year to year such that all major elements of the Plan are tested at least every 6 years."
- A. This change involves the deletion of the last sentence of paragraph one and the inclusion of a similar sentence into paragraph four and the subsequent incorporation of paragraph four into paragraph one. This change does not decrease the effectiveness of the E-Plan.
 - B. This change does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
5. Page 7-5 Section 7.1, 4.1 (1) Paragraph two, sentence one, changed "exercise" to "drill", and (2) paragraph three, sentence one, changed "exercise" to "drill".
- A. These changes support the distinction between an exercise and a drill as stated in Section 7.1.1.
 - B. These changes do not change the E-Plan regarding any of the planning standards or regulations.

C. No

D. No

6. Page 7-5 Section 7.1, 4.1 Paragraph four, sentence one, changed from "Any exercise that will provide for coordination with and participation of off-site emergency response personnel, organizations, and agencies including those of Federal, State, and local governments should escalate to a General Emergency." to "Any exercise that will provide for coordination with and participation of off-site emergency response personnel, organizations, and agencies including those of Federal, State, and local governments will escalate to a Site Area Emergency or General Emergency."

NOTE: This paragraph was incorporated into paragraph one as changed, see F.4 above.

A, B, C, and D – refer to F.4 above:

7. Page 7-8 Section 7.1, 5 Paragraph two, changed "Training Manager" to "Protection Services Manager" and added new last sentence, "Drill evaluations will also be conducted, though personnel involvement may be different."

A. This change identifies the change from Training Manager to Protection Services Manager (which was discussed above in B. 4). The distinction between an exercise and a drill is the basis for several other changes in this Chapter of the E-Plan. This addition clarifies that drill evaluations will also be conducted, but not as formally as those for evaluation of an exercise. This change does not decrease the effectiveness of the E-Plan.

B. This clarification does not change the E-Plan regarding any of the planning standards or regulations.

C. No

D. No

8. Page 7-8, Section 7.1, 5 Paragraph three was changed from "Training Manager" to "Protection Services Manager" in two sentences.

A, B, C, and D – refer to B. 4 above.

9. Page 7-9 Section 7.2, 2 Paragraph three, sentence two, was changed from "Emergency teams will receive specific training as specified in the following subsections." to "Specific training is specified in the following subsections."

A. Personnel trained in the E-Plan become members of the ERO, which would include emergency team members, so the term "Emergency Team" is not necessary. This change does not decrease the effectiveness of the E-Plan.

B. This deletion does not change the E-Plan regarding any of the planning standards or regulations.

C. No

D. No



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10. Page 7-9, Section 7.2, 2 Paragraph four was changed from "For employees with specific assignments or authorities as members of emergency teams, initial training and annual retraining programs will be provided. Training must be current to be maintained on the site Emergency Team Roster. The site Emergency Team Roster is updated by the Plant Training Manager once each calendar month. Security Emergency Planning training records are maintained by the Plant Training Manager." to "Training must be current to be maintained in the Emergency Response Organization (ERO). Emergency Plan Training records for Security personnel are maintained by the Plant Training Manager."
 - A. Reference to the Emergency Teams is no longer relevant as discussed in F. 9 above. Training requirements are annual so the elimination of a monthly check removes an unnecessary ultraconservatism associated with the tracking of training qualifications. In fact, training qualifications of current ERO members are checked periodically, (typically quarterly) as stated in Section 7.3 of the E-Plan. These changes do not decrease the effectiveness of the Plan.
 - B. These deletions do not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
11. Page 7-14 Section 7.3 Paragraphs 1, 2, and 3 changed "Training Manager" to Protection Services Manager" in five sentences.

A, B, C, and D – refer to B. 4 above.
12. Page 7-15 Section 7.3, 2 Paragraphs 2 and 3 changed "Training Manager" to "Protection Services Manager" in three sentences.

A, B, C, and D – refer to B. 4 above.
13. Page 7-16 Section 7.3, 5 Paragraph one, added new last sentence to read as follows: "Aspects of the program to be evaluated include the adequacy of interfaces with State and Local governments and of drills, exercises, capabilities and procedures."
 - A. This additional sentence, taken from the actual wording of the regulation, is added for completeness and not as a change in commitment. The "aspects" identified have always been included as part of the independent review of the EP program. This change does not decrease the effectiveness of the E-Plan.
 - B. This addition does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No
14. Page 7-16 Section 7.3, 5 Paragraph two, sentence one, changed "Training Manager" to "Protection Services Manager".

A, B, C, and D – refer to B. 4 above.

15. Page 7-16 Section 7.3, 6 Sentence three was changed from "The Training Manager is responsible for Emergency Plan distributions to the off-site agencies and organizations." to "Document Control also distributes the Emergency Plan to off-site agencies and organizations."
- A. Responsibility for distribution of the E-Plan is being transferred to Document Control within the Information Services Department. The Information Services Supervisor is a direct report to the Vice President – St. Lucie Plant so this is a lateral transfer of responsibility and therefore does not decrease the effectiveness of the E-Plan.
 - B. This transfer of responsibility does not change the E-Plan regarding any of the planning standards or regulations.
 - C. No
 - D. No