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SUBJECT: Forwards util objectives for 1991 facility annual emergency preparedness exercise.

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

Gentlemen:

Re: Turkey Point Unit 3 and Unit 4
Dockets No. 50-250 and 50-251
Emergency Exercise - December 1991

This letter forwards Florida Power & Light Company's objectives for the 1991 Turkey Point Annual Emergency Preparedness Exercise. The objectives were developed in conjunction with state and local governments. The exercise will be conducted on December 4, 1991 and will involve participation by local emergency response agencies and State emergency response personnel.

The exercise scenario package for the exercise is being forwarded only to the Emergency Preparedness Section Chief, Region II.

If there are any questions or comments concerning the exercise, or its objectives, please contact Mr. John Kirkpatrick at (305) 246-6226.

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Nuclear

attachment

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, Turkey Point Plant
W. Rankin, Emergency Preparedness Section Chief,
Region II, USNRC (w/attachment)

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FLORIDA POWER AND LIGHT COMPANY
TURKEY POINT NUCLEAR PLANT
1991 EMERGENCY PREPAREDNESS
EVALUATED EXERCISE
DECEMBER 4, 1991

EXERCISE SCOPE

To assure that the health and safety of the general public is protected in the event of an accident at Turkey Point Nuclear Plant (PTN), it is necessary for the Florida Power and Light Company (FPL) to conduct an annual emergency preparedness exercise. This is the 1991 Evaluated Exercise at Turkey Point Nuclear Plant. This exercise involves mobilization of FPL, State of Florida and Local Government Agency personnel and resources to respond to a simulated accident scenario. The exercise will be evaluated onsite by the Nuclear Regulatory Commission (NRC) and offsite by the Federal Emergency Management Agency (FEMA). An FPL Controller/Evaluator organization will control, observe, evaluate and critique the PTN portion of the exercise and the NRC will evaluate the FPL performance so that the emergency response capabilities of the utility may be assessed. A State of Florida and Local Government Agency Controller/Evaluator organization will control, observe, evaluate and critique the off-site portion of the exercise and FEMA will evaluate it so that the emergency response capabilities of the off-site agencies may be assessed.

Due to the compressed timeline of the exercise, some portions of the FPL Emergency Response Organization may be prepositioned. All onsite Emergency Response Facilities will be activated in accordance with simulated conditions and appropriate emergency response procedures for the exercise. Exercise participants ("players") will not have any prior knowledge of the simulated accident events, operational sequence, radiological effluent or weather conditions.

A radiological medical emergency will be integrated into the operational and radiological portion of the exercise scenario in order to evaluate the ability of the PTN plant staff to effectively respond to a contaminated/injured individual. The medical emergency will also test the ability of the designated hospital to treat a contaminated/injured patient.

State and Local Government Agencies will participate fully in the exercise.

In addition, the exercise incorporates the following:

Radiological Monitoring Drill - both onsite and off-site teams will be dispatched during the exercise to obtain required air samples and measurements associated with a simulated offsite release of radioactivity and communicate these results to the appropriate Emergency Response Facility (ERF). (Field monitoring team protective clothing and respiratory protection will be simulated in the field.)

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EXERCISE SCOPE (CONT'D)

Health Physics Drill - involves the response to and analysis of simulated elevated activity airborne or liquid samples, radiation exposure control, emergency dosimetry and the use of protective equipment onsite.

Onsite and Offsite Communications Drill - Actual usage and demonstration of the integrity of emergency response communications links and equipment.

Onsite Fire Drill - a demonstration of the onsite Fire Team to respond to and extinguish a simulated fire.

Medical Emergency Drill - a demonstration of the response to a simulated medical emergency situation involving radiological considerations including the packaging and transport of the simulated injured plant person to the designated off-site treatment facility.

The preceding sub-drills are incorporated into the exercise scenario and will be demonstrated concurrently in the course of the exercise.

The overall intent of the exercise is to demonstrate that the FPL staff assigned responsibilities in an emergency situation are adequately trained to perform in accordance with emergency preparedness plans and procedures.



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TURKEY POINT NUCLEAR PLANT
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EVALUATED EXERCISE
DECEMBER 4, 1991

EXERCISE OBJECTIVES

The Turkey Point Nuclear Plant (PTN) 1991 emergency preparedness evaluated exercise objectives are based upon Nuclear Regulatory Commission requirements provided in 10 CFR 50, Appendix E, *Emergency Planning and Preparedness for Production and Utilization Facilities*. Additional guidance provided in NUREG-0654, FEMA-REP-1, Revision 1, *Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants*, was utilized in developing the objectives.

The exercise will be conducted and evaluated using a realistic basis for activities. Scenario events will escalate to postulated core damage and subsequent simulated release of radioactive material to the environment.

The following objectives for the Turkey Point portion of the exercise are consistent with the aforementioned documents:

A. Accident Assessment and Classification

1. Demonstrate the ability to identify initiating conditions, determine Emergency Action Level (EAL) parameters and correctly classify the emergency throughout the exercise.

B. Notification

1. Demonstrate the ability to alert, notify and mobilize Florida Power and Light (FPL) emergency response personnel.
2. Demonstrate the capability to promptly notify the U.S. Nuclear Regulatory Commission (NRC), State and Local Authorities of an emergency declaration or change in emergency classification.
3. Demonstrate appropriate procedures for both initial and follow-up notifications.
4. Demonstrate the ability to provide follow-up information to State, Local and Federal Authorities.
5. Demonstrate the ability to provide accurate and timely information to State, Local and Federal Authorities concerning radioactive releases in progress.

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EXERCISE OBJECTIVES (CONTD)

C. Emergency Response

1. Demonstrate staffing and activation of Emergency Response Facilities (ERF).
2. Demonstrate planning for 24-hour per day emergency response capabilities.
3. Demonstrate the timely activation of the Technical Support Center (TSC) and Operational Support Center (OSC).
4. Demonstrate the functional and operational adequacy of the TSC, OSC, Emergency Operations Facility (EOF) and Emergency News Center (ENC).
5. Demonstrate the adequacy, operability and effective use of designated emergency response equipment.
6. Demonstrate the adequacy, operability and effective use of emergency communications equipment.
7. Demonstrate the ability of each emergency response facility manager to maintain command and control over the emergency response activities conducted within the facility throughout the exercise.
8. Demonstrate the ability of each facility manager to periodically inform facility personnel of the status of the emergency situation and plant conditions.
9. Demonstrate provision of periodic updates regarding plant casualty status to Off-Site Radiological Monitoring Teams.
10. Demonstrate the precise and clear transfer of Emergency Coordinator responsibilities from the Plant Supervisor - Nuclear to designated senior plant management and the subsequent transfer of the applicable Emergency Coordinator responsibilities to the Recovery Manager.
11. Demonstrate the ability to promptly and accurately transfer information between Emergency Response Facilities.



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EXERCISE OBJECTIVES (CONT'D)

C. Emergency Response (cont'd)

12. Demonstrate the ability of the TSC and OSC to coordinate the deployment of emergency teams.
13. Demonstrate the availability of qualified personnel and timely organization of reentry teams to assist in accident assessment and mitigation.
14. Demonstrate the capability for development of Protective Action Recommendations (PARs) for the general public within the 10 Mile Emergency Planning Zone (EPZ).
15. Demonstrate that PARs can be communicated to State and Local Authorities within the regulatory time constraints.
16. Demonstrate the ability to integrate emergency response activities with Federal emergency response personnel.
17. Demonstrate the ability to support State and Local field monitoring activities (EOF only).

D. Radiological Assessment and Control

1. Demonstrate the coordinated gathering of radiological and meteorological data necessary for emergency response, including collection and analysis of in-plant surveys and samples.
2. Demonstrate the capability to perform dose assessment.
3. Demonstrate the ability to compare onsite and off-site dose projections to Protective Action Guidelines (PAGs) and determine and recommend the appropriate protective actions.
4. Demonstrate the ability to provide dosimetry to emergency response personnel as required and adequately track personnel exposure.
5. Demonstrate the capability for onsite contamination control.
6. Demonstrate the ability to adequately control radiation exposure to onsite emergency workers, as appropriate to radiological conditions.



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EXERCISE OBJECTIVES (CONT'D)

D. Radiological Assessment and Control (cont'd)

7. Demonstrate the decision making process for authorizing emergency workers to receive radiation doses in excess of Turkey Point Plant administrative limits, as appropriate.
8. Demonstrate the ability to control and coordinate the flow of information regarding off-site radiological consequences between radiological assessment personnel stationed at the TSC and EOF.
9. Demonstrate the ability of field monitoring teams to respond to and analyze an airborne radiological release through direct radiation measurements in the environment.
10. Demonstrate the collection and analysis of air samples and provisions for effective communications and recordkeeping.
11. Demonstrate the ability to control and coordinate the flow of information regarding off-site radiological consequences with State radiological assessment personnel in the Emergency Operations Facility.

E. Public Information Program

1. Demonstrate the timely and accurate response to news inquiries.
2. Demonstrate the ability to brief the media in a clear, accurate and timely manner.
3. Demonstrate the ability to coordinate the preparation, review and release of public information with Federal (NRC and FEMA), State and Local Government Agencies as appropriate.
4. Demonstrate the ability to establish and operate rumor control.



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EXERCISE OBJECTIVES (CONT'D)

F. Medical Emergency

1. Demonstrate the ability to respond to a radiation medical emergency in a timely manner.
2. Demonstrate the capability of the First Aid and Personnel Decontamination Team to respond to a medical emergency, administer first aid and survey for contamination on a simulated contaminated injured individual.
3. Demonstrate the capability to arrange for and obtain transport and off-site medical support for a radiological accident victim.
4. Demonstrate the ability of Mercy Hospital personnel to treat an injured and/or contaminated patient.
5. Demonstrate the administrative means to document and monitor status of a medical emergency victim.

G. Fire Emergency

1. Demonstrate the ability of the Fire Brigade to respond to a simulated fire emergency in a timely and appropriate manner.

H. Evaluation

1. Demonstrate ability to conduct a post-exercise critique to determine areas requiring improvement or corrective action.

I. Exemptions

Areas of the PTN Emergency Plan that will NOT be demonstrated during this exercise include:

1. Site evacuation of non-essential personnel
2. Onsite personnel accountability
3. Actual shift turnover (long term shift assignments will be demonstrated by rosters).

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EXERCISE OBJECTIVES (CONT'D)

I. Exemptions (cont'd)

4. Real time activation of the EOF and ENC. (Emergency response personnel will not be allowed entry to the facilities until an appropriate time in the scenario, but will not be required to transit real-time to Miami due to time limitations in the exercise.)
5. Actual drawing of a sample utilizing the Post-Accident Sampling System (PASS)