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SUBJECT: Responds to NRC request for addl info re util 940323 request for one-time exemption from requirement of 10CFR50,App E, "Emergency Planning & Preparedness...." Details of emergency preparedness activities planned for 1994 encl.

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APR 13 1994
L-94-090
10 CFR 50.12
10 CFR 50 Appendix E

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

Subject: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Request for Exemption - 10 CFR 50 Appendix E
Response to Request for Additional Information

By letter L-94-63, dated March 23, 1994, Florida Power & Light Company (FPL) requested a one-time exemption from the requirement of 10 CFR 50 Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," to conduct an annual U. S. Nuclear Regulatory Commission (USNRC) evaluated emergency preparedness exercise in calendar year 1994 for Turkey Point Units 3 and 4. The purpose of this letter is to provide additional information as requested by members of the NRC staff during recent telephone conversations. Attachment 1 provides details of the Emergency Preparedness activities planned for 1994, in accordance with the Turkey Point Radiological Emergency Plan. Attachment 2 provides the scope and objectives for the Turkey Point integrated drill currently scheduled for July 27, 1994.

If you have any questions regarding this information, please contact us.

Very truly yours,

T. F. Plunkett
Vice President
Turkey Point Plant

Attachment

TFP/OIH

cc: Stewart D. Ebneter, Regional Administrator, Region II, USNRC
T. P. Johnson, Senior Resident Inspector, USNRC, Turkey Point Plant

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ATTACHMENT 1
to L-94-090

TURKEY POINT 1994 EMERGENCY PREPAREDNESS

A. 1994 Drills to Date

Accountability Drills -January 1994

Multiple accountability drills conducted to exercise procedures and demonstrate the use of the hand geometry access control system. Drills run on all shifts to demonstrate ability to account for all personnel onsite within thirty minutes.

Medical Drill - February 1994

Simulated contaminated, injured individual due to an inplant emergency requiring coordination with health physics, chemistry, operations, and contract medical personnel. Drill demonstrated the use of procedures, communications systems, and onsite emergency response equipment. Offsite transportation and assistance was simulated.

B. Exercises and Drills

Full Scale Exercise - July 1994

Full activation of FPL Emergency Response Facilities, radiological monitoring, protective action recommendations, communications with onsite and offsite personnel, and coordination with state and local organizations.

Radiological Monitoring Drills - June and November 1994

Simulated release due to an inplant radiological event to demonstrate onsite and offsite field monitoring (collection and analysis of air samples and analysis of direct radiation surveys); dose assessment evaluation and development of Protective Action Recommendations; and reentry of affected inplant areas.

Fire Drill - August 1994

Integrated drill with Metro Dade Fire Rescue support including activation of the onsite Fire Brigade and use of the communications links and notification procedures for requesting offsite assistance.

Medical Drill - September 1994

Simulated contaminated, injured individual due to an inplant emergency and requiring transportation of the individual to an offsite medical facility.

C. Continuing Drills

Health Physics Drills - June - August 1994

Field monitoring and contaminated injured drills as part of the annual health physic emergency training. Drills include coordination with Operations, Chemistry, and onsite Contract Medical personnel.

Communications Drills - Monthly

Monthly communications testing the operation of emergency communication circuits and transmission of messages for clarity and accuracy.

Operations Training Drills - September - October 1994

Simulator scenarios focusing on emergency preparedness response including notification, communication, classification, and Protective Action Recommendation. These drills are conducted in conjunction with annual emergency preparedness training, and are in addition to the simulator training which Operations personnel receive throughout the year.

Dose Assessment Drills - June - July 1994

Simulated radiological emergencies to exercise dose assessment personnel and procedures. Drills conducted as part of the annual emergency preparedness training.

ATTACHMENT 2
to L-94-090

FLORIDA POWER AND LIGHT COMPANY
TURKEY POINT NUCLEAR PLANT
1994 EMERGENCY PREPAREDNESS
INTEGRATED DRILL

2.1 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), Florida Power and Light Company (FPL) will conduct an annual emergency preparedness exercise. This exercise involves mobilization of FPL personnel and resources to respond to a simulated accident scenario. An FPL Controller organization will control, observe, evaluate and critique the PTN portion of the exercise. The State of Florida, and Dade and Monroe Counties' emergency response organizations will be offered the opportunity to participate in the exercise, and their performance will be evaluated by a State of Florida controller organization.

Due to the compressed timeline of the exercise, some portions of the FPL Emergency Response Organization and State 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 effluents or weather conditions.

In addition, the exercise incorporates the following:

Health Physics Drill - both onsite and offsite 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.) Teams will also demonstrate radiation exposure control, emergency dosimetry and the use of protective equipment onsite.

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

Medical Emergency Drill - a demonstration of the response to a simulated medical emergency situation involving radiological considerations including the preparation and transport of the simulated injured person to the designated offsite treatment facility. The medical emergency will also test the ability of the designated offsite treatment facility, Baptist Hospital, to treat a contaminated/injured patient.

2.1 SCOPE (Continued)

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 the Emergency Plan and its implementing procedures. Additionally, the exercise will assist the State and local government agencies in demonstrating that they are adequately trained to perform in accordance with emergency plans and procedures.

FLORIDA POWER AND LIGHT COMPANY
TURKEY POINT NUCLEAR PLANT
1994 EMERGENCY PREPAREDNESS
INTEGRATED DRILL

2.2 OBJECTIVES

The Turkey Point Nuclear Plant (PTN) emergency preparedness evaluated exercise objectives are based upon Nuclear Regulatory Commission requirements provided in 10 CFR 50: a) 50.47, *Emergency Plans;* and b) 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.

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

A. Exercise Planning

1. Conduct an exercise of the PTN Emergency Plan.

2. Provide an opportunity for the State of Florida and Dade and Monroe Counties to participate in an exercise.

3. Prepare an exercise information package, original and dissimilar to practice drill(s), to include:

   a. The objectives of the exercise and appropriate evaluation criteria.

   b. The date, time period, place, and a list of participating organizations

   c. The simulated sequence of events.

   d. The time schedule of real and simulated initiating events.

   e. The narrative summary.

4. Conduct a critique of the exercise and prepare an evaluation report.

2.2 OBJECTIVES (Continued)

B. Emergency Organizations, Support, and Resources

1. Demonstrate the prompt activation, adequacy of the staffing and set up, as appropriate, of emergency response facilities as follows:

   -Control Room
   -Technical Support Center (TSC)
   -Operations Support Center (OSC)
   -Emergency Operations Facility (EOF)
   -Emergency News Center (ENC)

2. Demonstrate the capability of the FPL Emergency Response Organization to implement their Emergency Plan Implementing Procedures.

3. Demonstrate the ability of the Emergency Response Facility Managers/Supervisors to provide overall direction, including "command and control" by initiating, coordinating, and implementing timely and effective decisions during a radiological emergency.

4. Demonstrate the ability to effectively transfer command and control of emergency response functions from the Control Room to the TSC/EOF.

5. Demonstrate the provisions for continuous staffing of the emergency facilities.

6. Demonstrate the interface capability between the FPL Emergency Response Organization and the State of Florida and Dade and Monroe Counties for effective response coordination to a radiological emergency and adequate protection of the health and safety of the public.

7. Demonstrate the ability to control access to emergency facilities.

8. Demonstrate adequacy of designated facilities and equipment to support emergency operations.

9. Based on scenario events, demonstrate that outside support agencies and organizations are available to provide assistance, as necessary.

10. Demonstrate the ability of corporate personnel to augment the Emergency Response Organization (ERO) and support the plant staff.

C. Accident Assessment and Classification

1. Demonstrate the availability of methods, equipment, and expertise to make assessments of the consequences of radiological hazards, including the dispatch and coordination of Field Monitoring Teams.

2. Demonstrate the ability to recognize emergency action levels (EALs) and properly classify emergencies in accordance with the Turkey Point Emergency Plan Implementing Procedures (EPIPs).

D. Notification and Communication

1. Demonstrate the ability to notify offsite emergency organizations within approximately 15 minutes of each emergency classification.

2. Demonstrate the ability to notify the NRC of any emergency classification within approximately one hour of the declaration.

3. Demonstrate the ability to notify FPL Emergency Response Organization personnel.

4. Demonstrate the ability to develop and send timely information to State and local authorities as required by the Emergency Plan.

5. Demonstrate the ability to communicate among the Control Room, TSC, OSC, EOF, and ENC, as appropriate.

6. Demonstrate that adequate communication capabilities exist between FPL, and the State and local Emergency Operations Centers (EOCs).

7. Demonstrate that adequate communications capabilities exist among FPL, the State Radiation Monitoring Teams and the Turkey Point Plant.

8. Demonstrate the ability to communicate among the Control Room, TSC, and EOF.

E. Radiological Consequence Assessment

1. Demonstrate methods and techniques for determining the source term of releases or potential releases of radioactive material.

2. Demonstrate the adequacy of methods and techniques for determining the magnitude of the releases of radioactive materials based on plant system parameters and effluent monitors.

3. Demonstrate the ability to estimate integrated dose from projected or actual dose rates and to formulate Protective Action Recommendations (PARs).

4. Demonstrate the ability to monitor and control emergency worker radiation exposure and implement exposure guidelines as appropriate.

5. Demonstrate the availability of respiratory protection, and protective clothing for onsite emergency response personnel.

6. Demonstrate the capability for onsite contamination control.

7. Demonstrate the ability to decontaminate onsite personnel, as appropriate.

8. Demonstrate the ability to evaluate the radiation exposure and contamination levels (external) of an accident victim, as appropriate.

9. Demonstrate the capability for onsite and offsite radiological monitoring, to include collection, and analysis of sample media (e.g. air) and provisions for communications and record keeping.

10. Demonstrate the capability to use the Post Accident Sampling System (PASS) (walk-through/simulate).

11. Demonstrate that a program exists to analyze fluid samples and provide the isotopic and chemical results of the analysis within three hours of the time the sample was first requested.

2.2 OBJECTIVES (Continued)

F. Protective Action

1. Demonstrate the ability to recommend protective actions to appropriate offsite authorities.

2. Demonstrate the ability to advise individuals onsite or in owner controlled areas of emergency conditions.

3. Demonstrate the capability for onsite first aid.

4. Demonstrate the ability to conduct search and rescue procedures if persons are identified as missing during accountability procedures.

G. Public Information

1. Demonstrate the operations of the ENC and the availability of space for the media.

2. Demonstrate the ability to brief the media in a clear, accurate and timely manner.

3. Demonstrate the ability to produce accurate press releases in appropriate time frames.

H. 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).

4. Actual drawing of a sample utilizing the Post-Accident Sampling System (PASS).