



U.S. NUCLEAR REGULATORY COMMISSION
STANDARD REVIEW PLAN
OFFICE OF NUCLEAR REACTOR REGULATION

SECTION 2.1.2 EXCLUSION AREA AUTHORITY AND CONTROL

REVIEW RESPONSIBILITIES

Primary - Accident Analysis Branch (AAB)

Secondary - Office of the Executive Legal Director (OELD)
 Industrial Security and Emergency Planning Branch (ISEPB)
 Division of Operational Safety, Emergency Preparedness
 Branch (DOS)
 Site Analysis Branch (SAB)

I. AREAS OF REVIEW

The applicant's legal authority to determine all activities within the designated exclusion area, as described in his safety analysis report (SAR), is reviewed to establish that the exclusion area meets the requirements of 10 CFR Part 100. 10 CFR § 100.3(a) requires that a reactor licensee have authority to determine all activities within the designated exclusion area, including the exclusion and removal of personnel and property. Determination of the acceptability of the designated exclusion area establishes the minimum distance to the exclusion area boundary that is used in dose computations.

All activities that may be permitted within the designated exclusion area, and that will not be related to routine operation of the plant, are reviewed to assure that they will not be incompatible with normal and emergency plant conditions.

In any case where the applicant does not own all the land within the designated exclusion area, assistance may be required of OELD in determining whether or not the designated exclusion area is acceptable under 10 CFR Part 100. Also, in some cases public roads which lie within the proposed exclusion area may have to be abandoned or relocated to permit plant construction. OELD assistance may be required to assure that no legal impediments to such abandonment or relocation are likely to ensue.

For cases where activities unrelated to plant operation may be permitted within the exclusion area, the reviewer should consult with the ISEPB regarding the adequacy of planning (construction permit stage) or plans (operating license stage) for protective measures for members of the public who may be within the exclusion area.

Where the need arises, it may be necessary to request the SAB to provide relative concentrations (X/Q) for distances less than the minimum distance to the exclusion area boundary.

USNRC STANDARD REVIEW PLAN

Standard review plans are prepared for the guidance of the Office of Nuclear Reactor Regulation staff responsible for the review of applications to construct and operate nuclear power plants. These documents are made available to the public as part of the Commission's policy to inform the nuclear industry and the general public of regulatory procedures and policies. Standard review plans are not substitutes for regulatory guides or the Commission's regulations and compliance with them is not required. The standard review plan sections are keyed to Revision 2 of the Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants. Not all sections of the Standard Format have a corresponding review plan.

Published standard review plans will be revised periodically, as appropriate, to accommodate comments and to reflect new information and experience.

Comments and suggestions for improvement will be considered and should be sent to the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, Washington, D.C. 20555.

11/24/75

9511010027 751124
 PDR NUREG
 75/087 R PDR

II. ACCEPTANCE CRITERIA

Absolute ownership of all lands within the exclusion area is considered to carry with it the required authority to determine all activities on this land and is acceptable. If the required authority is contingent upon future procurement of ownership, or by lease, contract, or other means, determination of whether or not the applicant's claimed authority meets or is likely to meet the requirements of Part 100 by the time of issuance of the staff safety evaluation report must be made by OELD. OELD must also determine that there is reasonable assurance that proposed public road abandonment or relocation will be achieved.

In some cases, the designated exclusion area may extend into bodies of water such as a lake, reservoir, or river which is routinely accessible to the public. This is acceptable provided the applicant has made appropriate arrangements with the local, state, federal, or other public agency having authority over the particular body of water. The arrangements made should provide for the exclusion and ready removal in an emergency, by either the applicant or the public agency in authority, of any persons on those portions of the body of water which lie within the designated exclusion area.

Activities within the exclusion area which are not related to plant operation are acceptable provided that no individual engaged in such activities is likely to receive, as a consequence of the design basis accidents postulated and evaluated in SAR Section 15, radiation doses which exceed 10 CFR Part 100 guidelines.

III. REVIEW PROCEDURES

Selection and emphasis of various aspects of the areas covered by this review plan will be made by the reviewer on each case. The judgment on the areas to be given attention during the review is to be based on an inspection of the material presented, the similarity of the material to that recently reviewed on other plants, and whether items of special safety significance are involved.

The reviewer should determine the basis on which the applicant claims authority within the exclusion area. If absolute ownership of all lands within the area is claimed, the acceptance criteria are satisfied. If any other method is claimed as providing the required authority, a memorandum should be prepared for OELD containing all of the appropriate information in the SAR, including copies of applicable SAR pages and figures, and requesting a written response as to whether or not the applicant's claimed authority meets the requirements of 10 CFR § 100.3(a). The memorandum should also include information in the PSAR which describes the applicant's plans, procedures, and schedule for obtaining any abandonment or relocation of public roads which may be required. At the operating license stage, the applicant's authority to determine all activities within the designated exclusion area will be reviewed. This review will emphasize those areas where the applicant did not possess absolute authority at the construction permit review.

If the designated exclusion area is traversed by a highway, railway, waterway, or other transportation route accessible to the public, the reviewer requests from ISEPB a written confirmation (bucksip) that the applicant's emergency plan includes adequate provisions for control of traffic on these routes in the event of an emergency. At the construction permit stage a finding that such provisions are feasible is adequate.

If activities unrelated to plant operation are to be permitted within the exclusion area, it will be necessary to determine that the potential radiation exposures to persons engaged in those activities resulting from the design basis accidents postulated and evaluated in SAR Section 15 do not exceed the guidelines of 10 CFR Part 100. The same method and model is to be used as was used to calculate the 2-hour exclusion area boundary dose.

IV. EVALUATION FINDINGS

The reviewer verifies that sufficient information has been provided, and that his evaluation is sufficiently complete and adequate to support conclusions of the following type, to be included in the staff's safety evaluation report:

"The applicant has described the plant exclusion area, the authority under which all activities within the exclusion area can be controlled, and the methods by which access and occupancy of the exclusion area can be controlled during normal operation and in the event of an emergency situation. The applicant has the required authority to control activities within the designated exclusion area, including the exclusion and removal of persons and property, and has established acceptable methods for control of the designated exclusion area. It is concluded, in view of the results of the dose computations of Section 15, that the exclusion area meets the guidelines of 10 CFR Part 100, and is acceptable."

V. REFERENCES

1. 10 CFR Part 100, "Reactor Site Criteria."
2. Regulatory Guide 1.70, "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants," Revision 2.

11/24/75

SRP 2.1.3