



May 20, 2021

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Pilgrim Nuclear Power Station
Renewed Facility License No. DPR-35
NRC Docket Nos. 50-293 and 72-1044

Subject: Supplemental Information to Update - License Amendment Request to Approve the Pilgrim Nuclear Power Station Independent Fuel Storage Installation Only Emergency Plan

References:

1. Letter from Holtec Decommissioning International, LLC (HDI) to US NRC, "License Amendment Request to Approve the Pilgrim Nuclear Power Station Independent Fuel Storage Installation Only Emergency Plan," February 18, 2021 (ML21049A192)
2. US NRC Electronic Mail Request to Andrea Sterdis (HDI) "Request for Additional Information Related to Request for Approval of Oyster Creek Nuclear Generating Station Independent Fuel Storage Installation Only Emergency Plan," April 8, 2021 (ML21099A038, ML21099A044)
3. Letter from Holtec Decommissioning International, LLC (HDI) to US NRC, "License Amendment Request to Approve the Oyster Creek Nuclear Generating Station Independent Fuel Storage Installation Only Emergency Plan," February 23, 2021 (ML21054A321)

By letter dated February 18, 2021 (Reference 1) Holtec Decommissioning International, LLC, (HDI) submitted a License Amendment Request (LAR) for Pilgrim Nuclear Power Station (PNPS). The proposed amendment would revise the site emergency plan for the Independent Site Fuel Storage Installation (ISFSI) Only condition.

In an electronic mail request dated April 8, 2021 (Reference 2), the NRC issued a Request for Additional Information (RAI) to Oyster Creek Nuclear Generating Station (OCNGS) indicating that it had reviewed the information submitted in Reference 3 and additional information was needed to support its continued review.

A review of the PNPS submittal indicates that the NRC RAIs sent to OCNGS are applicable to the PNPS License Amendment Request (Reference 1) since both Reference 1 and Reference 3 submittals utilized a common template.



Attachment 1 to this letter supplements Reference 1 by providing HDI's responses to the RAIs sent to OCNGS as applicable to the PNPS LAR provided in Reference 1. Attachment 2 provides updated clean pages of the PNPS ISFSI Only Emergency Plan and ISFSI Only Emergency Action Levels reflecting the response information provided in Attachment 1.

HDI has reviewed the information supporting a finding of No Significant Hazards Consideration and the Environmental Consideration provided to the NRC in Reference 1. The additional information provided in this submittal does not affect the previously stated bases in Reference 1 for concluding that the proposed license amendment does not involve a significant hazards consideration. In addition, the information provided in this submittal does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

The proposed changes are being submitted to the NRC for approval prior to implementation, as required under 10 CFR 50.54(q)(4).

There are no regulatory commitments contained in this submittal.

If you have any questions or require additional information, please contact me at (856) 797-0900, ext. 3813.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 20, 2021.

Sincerely,

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Attachments:

1. PNPS Response to NRC Request for Additional Information
- 2 Updated (clean) pages of the PNPS Independent Fuel Storage Installation Only Emergency Plan (IOEP) and PNPS ISFSI Only Emergency Actions Levels and Technical Bases (IOEAL)

cc:

USNRC Regional Administrator, Region I

USNRC Project Manager, NMSS – Pilgrim Nuclear Power Station

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HDI-PIL-21-057

Attachment 1

PNPS Response to NRC Request for Additional Information

(11 pages follow)

SUMMARY

By letter dated February 18, 2021 (Reference 1), Holtec Decommissioning International, LLC (HDI) submitted a license amendment request for review and approval of the Pilgrim Nuclear Power Station (PNPS) Independent Spent Fuel Storage Installation Facility (ISFSI) Only Emergency Plan and its associated Emergency Action Level scheme. The proposed changes were submitted to the U.S. Nuclear Regulatory Commission (NRC) for approval prior to implementation, as required under Paragraph 50.54(q)(4) of Title 10 of the Code of Federal Regulations (10 CFR).

In an electronic mail request dated April 8, 2021 (Reference 2), the NRC issued a Request for Additional Information (RAI) to Oyster Creek Nuclear Generating Station (OCNGS) indicating that it had reviewed the information submitted in Reference 3 and additional information was needed to support its continued review.

A review of the PNPS submittal indicated that the OCNGS RAIs were applicable to the PNPS License Amendment Request (Reference 1) since both Reference 1 and Reference 3 submittals utilized a common template.

Accordingly, this attachment provides HDI- Pilgrim's response to the NRC RAI issued to OCNGS contained in the Reference 2 electronic mail request. Each specific question is followed by HDI- Pilgrim's response.

Changes made to the previously submitted PNPS ISFSI Only Emergency Plan and EALs are shown as markups at the end of the RAI response as necessary. Attachment 2 to this submittal supplement contains clean corrected EPlan and EAL pages for replacement.

RAI's and HDI-Pilgrim Responses

NRC RAI - 1 to OCNGS

Requirement:

- 10 CFR 50.47(b)(12), requires that arrangements are made for medical services for contaminated injured individuals.
- 10 CFR Part 50, Appendix E.IV.E.6 requires arrangements for transportation of contaminated injured individuals from the site to specifically identified treatment facilities outside the site boundary.
- Associated guidance in NUREG-0654, Section II.B, Evaluation Criterion L.4 states that each licensee shall arrange for transporting victims of radiological accidents to medical facilities.

Issue: Section 5.2.2, "Ambulance Service," of Enclosure 1 Attachment 1, "Oyster Creek ISFSI Only Emergency Plan," states, Arrangements are made for prompt ambulance transport of persons with injuries involving radioactivity to designated hospitals. Such service is available on a 24-hour per day basis and is confirmed by letter of agreement.

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However, previously Section 7.2.3.1, "Local Services," of Attachment 3, "Clean Copy - Permanently Defueled Emergency Plan (PDEP)," in letter dated February 13, 2018 (ADAMS Accession No. ML18044A214), states,

1. Transportation of injured personnel using an ambulance service (Lacey Township, Lanoka Harbor, and Waretown First Aid Squads)

In letter dated October 17, 2018 (ADAMS Accession No. ML18221A400), the NRC issued the amendment approving the proposed permanently defueled emergency plan. The SER stated,

Therefore, the NRC staff concludes that the licensee's proposed Oyster Creek PDEP, as provided in **Attachment 3 to the licensee's letter dated February 13, 2018**, is acceptable.

The current text in IOEP Section 5.2.2 does not identify what ambulance services are available.

Request: Clarify what ambulance service(s) are confirmed by letter(s) of agreement with the OCNCS ISFSI.

HDI-Pilgrim Response to RAI - 1

Not applicable to the PNPS submittal. The IOEP specifies that ambulance services are provided by American Medical Response (AMR), Inc. and coordinated by the Plymouth Fire Department.

The submitted IOEP states:

2.1, Overview of ISFSI Emergency Plan

"Emergency services are provided by local, public, and private entities. Fire support services are provided by the Plymouth Fire Department; law enforcement support services are provided by local, Commonwealth, and Federal law enforcement authorities, as appropriate; ambulance services are provided by American Medical Response (AMR), Inc.; and medical services are provided by Beth Israel Deaconess Medical Center."

NRC RAI - 2 to OCNCS

Requirements:

- 10 CFR 50.47(b)(1), as exempted, requires that each principal response organization has staff to respond and augment its initial response on a continuous basis.
- 10 CFR 50.47(b)(2), as exempted, requires on-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times.
- 10 CFR Part 50, Appendix E.IV.A.1, as exempted, requires a description of the normal plant organization. Additionally, Appendix E.IV.A.2, as exempted, requires a description of the onsite emergency response organization (ERO).

- Associated guidance in NUREG-0654, Section II, Evaluation Criterion A.4, states each licensee shall be capable of continuous (24 hour) operation. Evaluation Criteria B.1, states that each licensee shall specify the on-site emergency organization of the plant staff personnel for all shifts and its relation to the responsibilities and duties of the normal staff complement. Evaluation Criteria 35 states each licensee shall specify the position or title and major tasks to be performed by persons to be assigned to the functional areas of emergency activities.

Issue: Section 6.1 "On-site Positions" of the IOEP only identifies the ISFSI Shift Manager/Security Operations Supervisor (ISS) position. Table 6—1 only identifies the Emergency Director as the on-shift staff to fill all functional areas.

Request: Identify other on-shift positions and types of staff that are available to fill emergency response functions at OCNGS ISFSI. Identify who would assume Emergency Director duties at OCNGS ISFSI if the ISS is incapacitated or somehow unavailable during a shift.

HDI-Pilgrim Response to NRC RAI - 2

The submitted IOEP states:

3.1.10 Emergency Director

This position is the highest level of authority for the PNPS Emergency Response Organization (ERO) and on-site emergency activities. This position is held by the ISFSI Shift Supervisor (ISS) or designated alternate. The ISS in the IOEP is equivalent to the Lead Security Shift Supervisor (LSSS) as defined in the ISFSI Only Security Plan.

On-shift positions are listed on in table 6-1 in the IOEP. As listed, the PSP dictates the number of security personnel on shift. The IO PSP requires a minimum of: Security Supervisor (ISS) and a Security Officer. The Security Officer would succeed the ISS if incapacitated until on call replacements are achieved. The Security Officer is trained to perform call outs and off-site notifications. This succession is covered in EIPs/Security procedures.

NRC RAI - 3 to OCNGS

Requirement:

- 10 CFR 50.47(b)(7), as exempted, requires the principal points of contact with news media for dissemination of information during and emergency are established in advance, and procedures for coordinated dissemination of information to the public are established.
- Associated guidance in NUREG-0654, Section II.G, Evaluation Criterion 3.a, states each principal organization shall designate the points of contact and physical location for use by news media during an emergence. Also, Evaluation Criteria 4.a states each licensee shall designate a spokesperson who should have access to all necessary information.

Evaluation Criteria 4.b states each licensee shall establish arrangements for timely exchange of information among designated spokespersons. Evaluation Criteria 4.c states each licensee shall establish coordinated arrangements for dealing with rumors.

Issue: In IOEP Section 6.2.1, the Resource Manager is identified as serving as the public information interface. In Section 11.0 "Public information," corporate public affairs personnel are identified to represent the facility as the company spokesperson, and to disseminate information to the public.

Request: Clarify the apparent duplication of responsibilities between the Resource Manager and corporate public affairs personnel for the OCNCS ISFSI.

HDI-Pilgrim Response to NRC RAI - 3

The Resource Manager provides information to the Corporate Public Affairs and coordinates with Corporate Public Affairs who becomes the lead on dissemination of information to the public. Section 6.2.1 Resource Manager functions have been updated to show that the Corporate Public Affairs becomes the lead for this function. DPP-PIL-EP-001 (IOEP) section 6.2.1 Resource Manager on page 19 following sentence change as follows:

The Resource Manager will augment the Emergency Director by assisting in the assessment of the emergency condition and coordinating any required resources, including serving as the public information interface (until turnover to Corporate Public Affairs occurs).

NRC RAI - 4 to OCNCS

Requirement:

- 10 CFR 50.47(b)(5), as exempted, requires procedures have been established for notification, by the licensee, of State and local response organizations...
- 10 CFR Part 50, Appendix E.IV.D.3, as exempted, requires a licensee to have the capability to notify responsible State and local governmental agencies after declaring an emergency.
- Associated guidance in NUREG-0654, Section "E. Evaluation Criterion E.1. states that each licensee shall establish procedures which describe mutually agreeable bases for notification of response organizations consistent with the emergency classification and action level scheme.

Issue: Section 9.0, "Notification Methods and Procedures," of Enclosure 1 Attachment 1, states, in part:

Procedures are established for the prompt notification to NJ OEM [New Jersey-Office of Emergency Management] and local organizations. . . .

However, previously the response to request for additional information (RAI) OC-03 in Attachment 1, "Response to Request for Additional Information," in letter dated February 13, 2018 states,

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Local organization EOCs [Emergency Operations Centers]: Ocean County, Lacey Township, and Ocean Township are notified by the State of New Jersey, as necessary, when an Unusual Event, Alert, or other State EOC notification has been made by the OC Shift Manager. The local county and townships have established this process for the current operating plant and will continue to support this method during this decommissioning period. The Local Warning Points/EOC block on Figure 6.1 [Exelon Notification Scheme] has been revised to indicate the three local EOCs that will be contacted by the State EOC in the attached revised PDEP.

The current text in IOEP Section 9.3.1 does not detail how the local governmental organizations will be notified.

Request: Clarify how the local governmental organizations will be notified of an emergency at the OCNGS ISFSI.

HDI-Pilgrim Response to NRC RAI - 4

Not applicable to the PNPS submittal. The submitted IEOP states:

9.2 Emergency Messages

The Emergency Director is responsible for the notification of an emergency declaration to MEMA, the Plymouth Fire Department, and the NRC within 60 minutes of the event classification or change in classification.

The Emergency Director directly notifies both state and local governmental response agencies.

NRC RAI - 5 to OCNGS

Requirement:

- 10 CFR 50.47(b)(8), as exempted, requires that adequate emergency facilities and equipment to support the emergency response are provided and maintained.
- 10 CFR Part 50, Appendix E.IV.E., as exempted, requires each licensee to describe emergency facilities.
- Associated guidance in NUREG-0654, Section II.H, Evaluation Criterion H.2, states each licensee shall establish an emergency facility from which evaluation and coordination of all licensee activities related to an emergency is to be carried out, and from which the licensee shall provide information to federal, State, and local authorities responding to emergencies. Also, in Evaluation Criteria H.6, each licensee shall make provisions to acquire data from or for emergency access to offsite monitoring and analysis equipment including geophysical phenomena monitors, (e.g., meteorological, and seismic).

Issue: IOEP Section 12.1, "Emergency Response Facilities," identifies the Emergency Response Facility (ERF) as the facility from which command and control functions are managed. However, the HDI-PIL-21-057

IOEP does not identify the location of the ERF. The IOEP does not include information on the availability of, or access to geophysical phenomena monitors.

Request: Provide the location of the ERF for the OCNGS ISFSI. Provide information on the availability of or access to geophysical phenomena monitors for the OCNGS ISFSI.

HDI-Pilgrim Response to NRC RAI - 5

The onsite ERF is the office area within the Indoctrination & Support (I&S) Building within close proximity to the ISFSI facility and is where the ISFSI Security Supervisor's Office is located. The ISFSI Security Supervisor's Office has been added to the DPP-PIL-EP-001 (IOEP) page 10, ERF definition 3.1.12 is changed as follows:

The ISFSI Security Supervisor's Office is the facility containing the communications equipment necessary for emergency conditions.

Geophysical information is available to the ISFSI Security Supervisor as described in EIPs by the following means:

The National Weather Service (NWS) Norton Massachusetts office provides meteorological information (e.g., wind speed, temperature, and wind direction) from several locations in the vicinity of PNPS. This information is available by telephone or the internet.

Seismic information can be obtained from the U.S. Geological Surveys (USGS) National Earthquake Center by telephone or internet or the Weston Observatory (New England Seismic Network) via the internet.

NRC RAI - 6 to OCNGS

Requirement:

- 10 CFR 50.47(b)(10), as exempted, requires that a range of protective actions has been developed for emergency workers.
- Associated guidance in NUREG-0654, Section II.J, Evaluation Criterion J.2, states each licensee shall make provisions for evacuation routes and transportation for onsite individuals. Also, Evaluation Criteria J.3 states each licensee shall provide for radiological monitoring of people evacuated from the site. Further, Evaluation Criteria J.6 states licensees shall make provisions for the use of individual respiratory protection.

Issue: The IOEP does not address evacuation routes or transportation for onsite individuals, radiological monitoring of site evacuees, or the provision of respiratory protective equipment.

Request: Provide information on evacuation routes, monitoring of people evacuated from the site, and provision of respiratory protective equipment for the OCNGS ISFSI.

HDI-Pilgrim Response to RAI - 6

Details of “Evacuation routes” and “Radiation monitoring” are covered in Emergency Plan Implementing Procedures (EPIPS) and Site radiation control procedures. Primary evacuation is to off site. Medical evacuation is to one of the two listed hospitals in the IOEP.

The protective equipment for PNPS ISFSI is listed in Appendix A page 42 of DPP-PIL-EP-001 (IOEP) has the following change:

- Protective clothing, including respiratory protection.

NRC RAI - 7 to OCNCS

Requirement:

- 10 CFR 50.47(b)(15), requires radiological emergency response training is provided to those who may be called on to assist in an emergency.
- 10 CFR Part 50, Appendix E.IV.F.1 requires description of specialized initial training and periodic retraining of categories of emergency personnel, including first aid and rescue teams.
- Associated guidance in NUREG-0654, Section II.B, Evaluation Criterion O.3, as modified by Attachment 1 to NSIR/DPR-ISG-02, "Emergency Planning Exemption Requests for Decommissioning Nuclear Power Plants" (ADAMS Accession No. ML14106A057), states that each licensee shall arrange for transporting victims of radiological accidents to medical facilities.

Issue: Section 19.1.2, “First Aid Personnel,” of Enclosure 1 Attachment 1, states,

First Aid training is provided to personnel assigned on-shift in accordance with site training and qualification plan.

However, previously Section 11.2.2, “Emergency Response Organization Training,” of Attachment 3, in letter dated February 13, 2018 (ADAMS Accession No. ML18044A214), states,

Personnel assigned the responsibility of first aid response will be trained with courses equivalent to Red Cross First Aid, CPR, or AED for Lay Responders or equivalent.

The current text of Section 19.1.2 “First Aid Personnel” does not provide information on the level of training provided.

Request: Clarify what level/type of training first aid personnel receive at the OCNCS ISFSI.

HDI-Pilgrim Response to RAI - 7

The following sentence has been added to Section 19.1.2 on page 37 of DPP-PIL-EP-001 (IOEP):

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Personnel assigned the responsibility of first aid response will be qualified by an accredited nationally recognized organization (e.g. American Red Cross, American Heart Association, etc.) in First Aid, CPR, or AED for Lay Responders or equivalent.

NRC RAI - 8 to OCNCS

Requirement:

- 10 CFR 50.47(b)(16), as exempted, requires that responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.
- Associated guidance in NUREG-0654, Section II.P, Evaluation Criterion P.7, states each plan shall contain a listing, by title, procedures required to implement the plan. The listing shall include the section(s) of the plan to be implemented by each procedure.

Issue: The IOEP includes an Appendix B, which has a column to identify appropriate procedures. However, the column only indicates TBD for all procedures.

Request: Provide an appropriate listing, by title, of the procedures required to implement the IOEP for the OCNCS ISFSI.

HDI-Pilgrim Response to RAI - 8

EPIPs will follow similar level of detail as provided for the PDEP for emergency preparedness actions that are required by the IOEP. The EPIP titles will be updated prior to implementation of the IOEP.

NRC RAI - 9 to OCNCS

Requirement:

- 10 CFR 50.47(b)(4), as exempted, requires a standard emergency classification and action level scheme.
- 10 CFR Part 50, Appendix E.IV.B.1, as exempted, requires a description of the means to be used for determining the magnitude of, and for continually assessing the impact of, the release of radioactive materials shall be described, including emergency action levels that are to be used as criteria for determining the need for notification.
- Associated guidance in NUREG-0654, Section II.D, Evaluation Criterion D.1, states that an emergency classification and emergency action level scheme must be established by the licensee.

Issue: PD-HA1, "Hostile Action is occurring or has occurred," of Enclosure 1, Attachment 2, "EAL Bases," states,

This IC [Initiating Condition] addresses the notification of an aircraft attack threat or an occurrence of a HOSTILE ACTION within the OWNER CONTROLLED AREA.

However, the EAL itself does not state the location in the Emergency Action Level.

Request: Revise the Emergency Action Level to include the location discussed in Enclosure 1, Attachment 2, "EAL Bases".

HDI-Pilgrim Response to RAI - 9

"within the OWNER CONTROLLED AREA" has been added to the EAL PD-HA1 and repeated in the bases document. See Attachments 1 and 2, DPP-PIL-EP-002 (IO EAL) pages 14 and 18.

1. A HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA as reported by the Security Shift Supervisor.

NRC RAI - 10 to OCNCS

Requirement:

- 10 CFR 50.47(b)(4), as exempted, requires a standard emergency classification and action level scheme.
- 10 CFR Part 50, Appendix E.IV.B.1, as exempted, requires a description of the means to be used for determining the magnitude of, and for continually assessing the impact of, the release of radioactive materials shall be described, including emergency action levels that are to be used as criteria for determining the need for notification.
- Associated guidance in NUREG-0654, Section II.B, Evaluation Criterion D.1, states that an emergency classification and emergency action level scheme must be established by the licensee.

Issue: Definitions section," of Enclosure 1 Attachment 2, "EAL Bases," does not have a definition for the following terms:

- Emergency Action Level (EAL)
- Emergency Classification Level (ECL)
- Initiating Condition (IC)

Request: Revise the definition section to include the definitions for Emergency Action Level (EAL), Emergency Classification Level (ECL), and Initiating Condition (IC).

HDI-Pilgrim Response to RAI - 10

Not applicable to the PNPS submittal. The submitted IEOP states:

Emergency Action Level (EAL): Refer to Section 3.3.

Emergency Classification Level (ECL): Refer to Section 3.1.

Initiating Condition (IC): Refer to Section 3.2

NRC RAI - 11 to OCNCS

Requirement:

- 10 CFR 50.47(b)(4), as exempted, requires a standard emergency classification and action level scheme.
- 10 CFR Part 50, Appendix E.IV.B.1, as exempted, requires a description of the means to be used for determining the magnitude of, and for continually assessing the impact of, the release of radioactive materials shall be described, including emergency action levels that are to be used as criteria for determining the need for notification.
- Associated guidance in NUREG-0654, Section II.B, Evaluation Criterion D.1, states that an emergency classification and emergency action level scheme must be established by the licensee.

Issue: The Definitions section of Enclosure 1 Attachment 2, "EAL Bases," has the following terms that are not used in the EAL Bases:

- Normal Level
- Unplanned

Request: Revise the Definitions section to exclude the definitions for Normal Level and Unplanned.

HDI-Pilgrim Response to RAI - 11

Definitions have been removed from DPP-PIL-EP-002 (IO EAL) page 11.

~~**NORMAL LEVELS:** As applied to radiological IC/EALs, the highest reading in the past twenty-four hours excluding the current peak value.~~

~~**UNPLANNED:** A parameter change or an event that is not 1) the result of an intended evolution or 2) an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.~~

References:

1. Letter from Holtec Decommissioning International, LLC (HDI) to US NRC, "License Amendment Request to Approve the Pilgrim Nuclear Power Station Independent Fuel Storage Installation Only Emergency Plan," February 18, 2021 (ML21049A192)
2. US NRC Electronic Mail Request to Andrea Sterdis (HDI) "Request for Additional Information Related to Request for Approval of Oyster Creek Nuclear Generating Station Independent Fuel Storage Installation Only Emergency Plan," April 8, 2021 (ML21099A038, ML21099A044)
3. Letter from Holtec Decommissioning International, LLC (HDI) to US NRC, "License Amendment Request to Approve the Oyster Creek Nuclear Generating Station Independent Fuel Storage Installation Only Emergency Plan," February 23, 2021 (ML21054A321)



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Attachment 2

**Updated (clean) pages of the PNPS Independent Fuel Storage
Installation Only Emergency Plan (IOEP) and PNPS ISFSI Only
Emergency Actions Levels and Technical Bases (IOEAL)**

(7 pages follow)

	ISFSI Only Emergency Plan	Procedure Number: DPP-PIL-EP-001	Revision: 0
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3.1.11 Emergency Plan Implementing Procedure (EPIP)

Specific procedures describing actions taken by plant staff to activate and implement the IOEP.

3.1.12 Emergency Response Facility (ERF)

The ISFSI Security Supervisor's Office is the facility containing the communications equipment necessary for emergency conditions. It is operated under the direction of the Emergency Director and serves as the primary location for classification of the emergency, notification of the emergency to offsite agencies, assessment actions, and emergency action direction.

3.1.13 Emergency Response Organization (ERO)

Organization comprised of assigned individuals who would respond and assist during a classified emergency.

3.1.14 Fire

Combustion characterized by heat and light. Sources of smoke such as slipping drive belts or overheated electrical equipment do not constitute fires. Observation of flame is preferred but is not required if large quantities of smoke and heat are observed.

3.1.15 Frequency

That unit of time specified (monthly, quarterly, etc.) plus or minus 25 percent, unless otherwise specifically stated. This definition does not apply to "Annual" when it is related to the conduct of the Biennial Exercise. Biennial Exercises are performed within the calendar year.

3.1.16 Hostile Action

An act toward the ISFSI or its personnel that includes the use of violent force to destroy equipment, take hostages, and/or intimidate the licensee to achieve an end. This includes attack by air, land or water using guns, explosives, projectiles, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. Hostile action should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the ISFSI. Non-terrorism-based EALs should be used to address such activities, (e.g., violent acts between individuals in the Owner Controlled Area).

3.1.17 Hostile Force

One or more individuals who are engaged in a determined assault, overtly or by stealth and deception, equipped with suitable weapons capable of killing, maiming, or causing destruction.

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- Suspending security measures

6.1.2 Security

Security is maintained in accordance with the ISFSI Physical Security Plan. Security performs accountability as directed by the ISS or Emergency Director.

6.2 Augmented ERO Positions

PNPS maintains the necessary personnel and resources to support the PNPS ISFSI Emergency Director in responding to an emergency.

In addition to the resources listed below, additional personnel resources may be directed to report to the PNPS ISFSI by the Emergency Director to provide additional support as needed to assess radiological conditions, support maintenance and repair activities, develop and implement corrective action plans, and assist with recovery actions. The augmentation personnel are available from PNPS staff and can be requested from various contractors.

6.2.1 Resource Manager

The Resource Manager will be in contact with the Emergency Director within two (2) hours of an emergency declaration. The Resource Manager will augment the Emergency Director by assisting in the assessment of the emergency condition and coordinating any required resources, including serving as the public information interface (until turnover to Corporate Public Affairs occurs). The Resource Manager does not need to physically report to PNPS to perform the assigned responsibilities.

6.2.2 Augmented Responder

For a declared emergency involving radiological consequences, a minimum of one person trained in radiological monitoring and assessment will report to the PNPS ISFSI within four (4) hours of the emergency declaration.

6.2.3 Offsite Response Organizations

Additional support is available from OROs, as described in Section 5.2 of this Plan.

6.3 Functional Responsibilities

Table 6-1 lists the functional responsibilities that fulfill emergency staffing capabilities.

APPENDIX A
EMERGENCY EQUIPMENT, SUPPLIES AND REFERENCE MATERIALS

EMERGENCY RESPONSE FACILITY

Procedures / Reference Materials

- ISFSI Only Emergency Plan
- ISFSI Only EAL Technical Bases Document
- Emergency Telephone Directory
- EPIPs


Equipment

- Portable radiation monitoring instrument
- Portable emergency lighting
- Medical emergency response kit

ONSITE LOCATIONS

Equipment / Supplies

- Portable radiation and contamination monitoring instruments
- Contamination control supplies
- Decontamination control supplies
- Protective clothing, including respiratory protection
- Dosimeters
- Radiological postings and barricades

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receive duty-specific training. Additional emergency preparedness training is provided as part of annual access training.

19.1.2 First Aid Personnel

First Aid training is provided to personnel assigned on-shift in accordance with site training and qualification plan. Personnel assigned the responsibility of first aid response will be qualified by an accredited nationally recognized organization (e.g. American Red Cross, American Heart Association, etc.) in First Aid, CPR, or AED for Lay Responders or equivalent.

19.1.3 Radiation Monitoring Personnel

Radiation monitoring personnel shall have training conducted such that proficiency is maintained on the topics listed below. These subjects shall be covered as a minimum on an annual basis.

- Use of Radiation Protection procedures
- Use of emergency survey equipment
- Communications
- Field Surveys
- Role of dose assessment in an emergency
- Monitoring of radioactive releases
- Protective actions for onsite personnel
- Review of applicable drill and exercise-identified deficiencies

19.1.4 Personnel Badged for Unescorted Access

Personnel who are badged for unescorted access receive access training annually. Information pertaining to their safety and the safety of visitors under escort during a classified emergency is included in this training.

Access training shall include the following emergency preparedness topics:

- Basic Emergency Plan and implementing preparedness topics
- Emergency classification levels
- Call out of personnel during an emergency
- Personnel accountability procedures


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ATTACHMENT 1

Table PD-1: Recognition Category "PD" and "E" Initiating Condition Matrix

ALERT		UNUSUAL EVENT	
Hazards and Other Conditions Affecting Facility Safety			
Hostile Action	<p>PD-HA1 HOSTILE ACTION is occurring or has occurred.</p> <p>Emergency Action Level (EAL):</p> <ol style="list-style-type: none"> 1. A HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA as reported by the Security Shift Supervisor. 	Hostile Action	<p>PD-HU1 Confirmed SECURITY CONDITION or threat.</p> <p>Emergency Action Level (EAL):</p> <ol style="list-style-type: none"> 1. Notification of a credible security threat directed at the site <p>OR</p> <ol style="list-style-type: none"> 2. A SECURITY CONDITION that does not involve a HOSTILE ACTION as reported by the Security Shift Supervisor.
	<p>PD-HA3 Other conditions exist which in the judgment of the Emergency Director warrant declaration of an ALERT.</p> <p>Emergency Action Level (EAL):</p> <p>Other conditions exist which, in the judgment of the Emergency Director, indicate that events are in progress or have occurred which involve an actual or potential substantial degradation of the level of safety of the facility or a security event that involves probable life-threatening risk to site personnel or damage to site equipment because of HOSTILE ACTION. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.</p>		<p>PD-HU3 Other conditions exist which in the judgment of the Emergency Director warrant declaration of an UNUSUAL EVENT.</p> <p>Emergency Action Level (EAL):</p> <p>Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which indicate a potential degradation of the level of safety of the facility or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of equipment required for spent fuel cooling occurs.</p>
Emergency Director Judgment		Emergency Director Judgment	

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ATTACHMENT 2 – EAL BASIS

PD-HA1

Initiating Condition:

HOSTILE ACTION is occurring or has occurred.

Emergency Action Level (EAL):

1. A HOSTILE ACTION is occurring or has occurred within the OWNER CONTROLLED AREA as reported by the Security Shift Supervisor.

Basis:

This IC addresses the notification of an aircraft attack threat or an occurrence of a HOSTILE ACTION within the OWNER CONTROLLED AREA. This event will require rapid response and assistance due to the possibility of the attack progressing to the PROTECTED AREA, or the need to prepare the facility and staff for a potential aircraft impact.

Security plans and terminology are based on the guidance provided by NEI 03-12, *Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan [and Independent Spent Fuel Storage Installation Security Program]*.

As time and conditions allow, these events require a heightened state of readiness by the facility staff and implementation of onsite protective measures (e.g., evacuation, dispersal or sheltering). The ALERT declaration will also heighten the awareness of Offsite Response Organizations (ORO), allowing them to be better prepared should it be necessary to consider further actions.


This IC does not apply to incidents that are accidental events, acts of civil disobedience, or otherwise are not a HOSTILE ACTION perpetrated by a HOSTILE FORCE. Examples include the crash of a small aircraft, shots from hunters, physical disputes between employees, etc. Reporting of these types of events is adequately addressed by other EALs, or the requirements of 10 CFR § 73.71 or 10 CFR § 50.72.

EAL #1 Basis

This EAL is applicable for any HOSTILE ACTION occurring, or that has occurred, in the OWNER CONTROLLED AREA. This includes any action directed against an ISFSI that is located outside the facility PROTECTED AREA.

Basis Reference(s):

1. NEI 99-01 Rev 6, PD-HA1
2. Station Security Plan

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Emergency Classification Level (ECL): Refer to Section 3.1.

Initiating Condition (IC): Refer to Section 3.2.

HOSTILE ACTION: An act toward a Nuclear Power Plant (NPP) or its personnel that includes the use of violent force to destroy equipment, take Hostages, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the NPP. Non-terrorism-based EALs should be used to address such activities (i.e., this may include violent acts between individuals in the owner controlled area).

HOSTILE FORCE: Any individuals who are engaged in a determined assault, overtly or by stealth and deception, equipped with suitable weapons capable of killing, maiming, or causing destruction.

Imminent: The trajectory of events or conditions is such that an EAL will be met within a relatively short period of time regardless of mitigation or corrective actions.

INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI): A complex that is designed and constructed for the interim storage of spent nuclear fuel and other radioactive materials associated with spent fuel storage.

OWNER CONTROLLED AREA (OCA): The property associated with the station and owned by the company. Access is normally limited to persons entering for official business.

PROTECTED AREA: An area that normally encompasses all controlled areas within the security protected area fence.

SECURITY CONDITION: Any Security Event as listed in the approved security contingency plan that constitutes a threat/compromise to site security, threat/risk to site personnel, or a potential degradation to the level of safety of the plant. A SECURITY CONDITION does not involve a HOSTILE ACTION.

VISIBLE DAMAGE: Damage to a component or structure that is readily observable without measurements, testing, or analysis. The visual impact of the damage is sufficient to cause concern regarding the operability or reliability of the affected component or structure.