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**Subject:** Demonstration Drill  
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**Attachments:** [Demonstration Drill.pdf](#)

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Jerry,

From the March 19, 2024, public meeting, NextEra proposed it could conduct an emergency preparedness drill to demonstrate certain attributes of the proposed changes to the common fleet emergency preparedness plan that were the subject of previous Requests for Additional Information and discussed at the public meeting as challenges to the NRC staff's review. In further discussions with NextEra, we understand that you'd like this drill to occur in June. The NRC staff has put together a list of attributes that the staff would like the drill to demonstrate. Please ensure that the June drill covers these items.

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The NRC staff assessed the differences between the NextEra fleet and has determined that the demonstration drill for the NextEra license amendment for the proposed common fleet emergency plan to be conducted at the Point Beach Nuclear Plant is acceptable with the following attributes:

1. The non-licensed operator staffing for the drill should be at the level of the normal shift staffing identified at the Seabrook Station.
2. The drill should sufficiently demonstrate the following objectives that were provided by NextEra in their responses to specific request for additional information (RAI). Prior to augmentation of the onsite emergency response facilities, demonstrate the performance of:
  - a. operations troubleshooting activities (RAI 26).
    - i. Demonstrate that minor maintenance could be addressed by the on-shift Operations crew.
      - 1) Demonstrate that complex maintenance issues are addressed by the stations troubleshooting process.
        - a) Demonstrate that troubleshooting plans will be developed per the current/ normal site processes.
        - b) Demonstrate that engineering staff and FIN Supervisor will remotely report to the SM/ED within 60 minutes and start the development of the troubleshooting plan.
      - 2) If information is needed from the field (pictures, videos, instrument readings, etc.), then demonstrate that the on-shift Operations crew can provide the necessary information.
    - ii. Demonstrate that complex maintenance issues are addressed by the stations troubleshooting process.
  - b. command and control by the interim remote personnel (RAIs 1, 12 and 33).
    - i. Demonstrate that a qualified Site Emergency Director (SED) will be in contact with the Shift Manager/Emergency Director (SM/ED) remotely to assist in Command and Control within 60-minutes of an Alert or higher declared emergency,
    - ii. Demonstrate that remote "Interim" response by a Radiation Protection Coordinator (TSC) or Radiation Protection Supervisor (OSC) to support and discuss radiological considerations with the On-shift Staff (SM/ED) and remote staff (Dose Assessor and Engineers) within 60 minutes.
    - iii. Demonstrate that the Shift Manager will have command and control of all responding personnel during the brief time period prior to arrival of an Emergency Director in the TSC.
      - 1) Demonstrate that the following remote "interim" response positions will contact the on-shift staff and will relieve, assist, and provide expertise to the Shift Manager within 60 minutes to 90 minutes (activation of ERFs):
        - a) Qualified Site Emergency Director
        - b) OSC FIN Supervisor
        - c) Radiation Protection Coordinator (TSC) or Radiation Protection Supervisor
  - c. radiation protection functions by the on-shift staff (RAIs 9, 12 and 28).
    - i. Demonstrate that during an emergency, the on-shift radiation protection function provides qualified radiation protection coverage for responders accessing potentially unknown radiological environments during emergency conditions, in-plant surveys, and control of dosimetry and radiological adequate to perform these functions until augmented at 90-minutes.

- ii. Demonstrate that Non-license Operators trained as RP-Ops can be utilized to respond to and able to provide radiological assessments of multiple and wide spectrum of events.
    - iii. Demonstrate that onsite field monitoring is able to be performed by available Radiation Protection on shift positions or non-licensed operators until relieved at 90 minutes.
  - d. dose assessment functions by the on shift personnel (RAIs 19).
    - i. Demonstrate that the on shift Dose Assessor can perform collateral duties such as communications and radiological surveys such that the collateral duties do not interfere or inhibit the performance of the dose assessment function until relieved.