Supplemental Information 2

Turkey Point Plant (PTN) COLA Emergency Plan Regulatory Requirements Matrix (Rev. 0)

Turkey Point Plant (PTN) COLA Emergency Plan Regulatory Requirements Matrix

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TABLE 1
10CFR50 Appendix E Emergency Preparedness Cross Reference

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
IV A.	The organization for coping with radiological emergencies shall be described, including definition of authorities, responsibilities, and duties of individuals assigned to the licensees emergency organization	B.1, B.5		
IV A.	and the means for notification of such individuals in the event of an emergency.	E.2		
IV A.1	A description of the normal plant operating organization.	B.1		
IV A.2.a	A description of the onsite emergency response organization with a detailed discussion of: Authorities, responsibilities, and duties of the individual(s) who will take charge during an emergency;	B.2, B.3, B.5		
IV A2.b	Plant staff emergency assignments;	B.5		
IV A2.c	Authorities, responsibilities, and duties on an onsite emergency coordinator who shall be in charge of the exchange of information with offsite authorities responsible for coordinating and implementing offsite emergency measures.	B.2, B.4		
IV A.3	A description, by position and function to be performed, of the licensee's headquarters personnel who will be sent to the plant site to augment the onsite emergency organization.	B.5.c, B.7		
IV A.4	Identification, by position and function to be performed, of persons within the licensee organization who will be responsible for making offsite dose projections, and a description of how these projections will be made and the results transmitted to State and local authorities, NRC, and other appropriate governmental entities.	B5.b.2, 3, 4 5, 6, 7, & 11		

TABLE 1
10CFR50 Appendix E Emergency Preparedness Cross Reference

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
IV A.5	Identification, by position and function to be performed, of other employees of the licensee with special qualifications for coping with emergency conditions that may arise. Other persons with special qualifications, such as consultants, who are not employees of the licensee and who may be called upon for assistance for emergencies shall also be identified. The special qualifications of these persons shall be described.	A.3		
IV A.6	A description of the local offsite services to be provided in support of the licensee's emergency organization.	L.1, 2, 3, 4		
IV A.7	Identification of, and assistance expected from, appropriate State, local, and Federal agencies with responsibilities for coping with emergencies.	C.1, 2, 3, 4		
IV A.8	Identification of the State and/or local officials responsible for planning for, ordering, and controlling appropriate protective actions, including evacuations when necessary.	J.9		
IV B	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,	I.2, I.3, I.4, I.5, I.6, I.7, I.8, I.9, I.10		
IV B (continued)	including emergency action levels that are to be used as criteria for determining the need for notification and participation of local and State agencies, the Commission, and other Federal agencies,	Annex 1, Annex 2, Annex 3, E.2, E.3,		
IV B (continued)	and the emergency action levels that are to be used for determining when and what type of protective measures should be considered within and outside the site boundary to protect health and safety.	Annex 1, Annex 2, Annex 3, J.7, J.9, J.10		
IV B (continued)	The emergency action levels shall be based on in-plant conditions and instrumentation in addition to onsite and offsite monitoring.	Annex 1, 3.2, Annex 2, 3.2, Annex 3, 3.2		
IV B (continued)	These emergency action levels shall be discussed and agreed on by the applicant and State and local governmental authorities and approved by NRC.	D.2		
IV B (continued)	They shall also be reviewed with the State and local governmental authorities on an annual basis.	D.3		
IV C	The entire spectrum of emergency conditions that involve the alerting or activating of progressively larger segments of the total emergency organization shall be described.	D.1		
IV C (continued)	The communication steps to be taken to alert or activate	E.2		

TABLE 1
10CFR50 Appendix E Emergency Preparedness Cross Reference

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
	emergency personnel under each class of emergency shall be described.			
IV C (continued)	Emergency action levels (based not only on onsite and offsite radiation monitoring information but also on readings from a number of sensors that indicate a potential emergency, such as the pressure in containment and the response of the Emergency Core Cooling System) for notification of offsite agencies shall be described.	Annex 1, Annex 2, Annex 3		
IV C (continued)	The existence, but not the details, of a message authentication scheme shall be noted for such agencies.	E.1		
IV C (continued)	The emergency classes defined shall include: (1) notification of unusual events, (2) alert, (3) site area emergency, and (4) general emergency. These classes are further discussed in NUREG - 0654; FEMA - REP - 1.	D.1		
IV D.1	Administrative and physical means for notifying local, State, and Federal officials and agencies and agreements reached with these officials and agencies for the prompt notification of the public and for public evacuation or other protective measures, should they become necessary, shall be described. This description shall include identification of the appropriate officials, by title and agency, of the State and local government agencies within the EPZs.	E.3		
IV D.2	Provisions shall be described for yearly dissemination to the public within the plume exposure pathway EPZ of basic emergency planning information, such as the methods and times required for public notification and the protective actions planned if an accident occurs, general information as to the nature and effects of radiation, and a listing of local broadcast stations that will be used for dissemination of information during an emergency. Signs or other measures shall also be used to disseminate to any transient population within the plume exposure pathway EPZ appropriate information that would be helpful if an accident occurs.	G.1, G.2		
IV D.3	A licensee shall have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency.	E.2.b.1		
IV D.3 (continued)	The design objective of the prompt public notification system shall be to have the capability to essentially complete the initial notification of the public within the	E.6		

TABLE 1
10CFR50 Appendix E Emergency Preparedness Cross Reference

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
	plume exposure pathway EPZ within about 15 minutes. The use of this notification capability will range from immediate notification of the public (within 15 minutes of the time that State and local officials are notified that a situation exists requiring urgent action) to the more likely events where there is substantial time available for the State and local governmental officials to make a judgment whether or not to activate the public notification system. Where there is a decision to activate the notification system, the State and local officials will determine whether to activate the entire notification system simultaneously or in a graduated or staged manner. The responsibility for activating such a public notification system shall remain with the appropriate governmental authorities.			
IV 4.E.1	Adequate provisions shall be made and described for emergency facilities and equipment, including: Equipment at the site for personnel monitoring;	H.1, H.2, H.5		
IV 4.E.2	Equipment for determining the magnitude of and for continuously assessing the impact of the release of radioactive materials to the environment;	H.5.b, H.5.d		
IV 4.E.3	Facilities and supplies at the site for decontamination of onsite individuals;	H.5.b, H.5.c		
IV 4.E.4	Facilities and medical supplies at the site for appropriate emergency first aid treatment;	L.2		
IV 4.E.5	Arrangements for the services of physicians and other medical personnel qualified to handle radiation emergencies on-site;	L.3		
IV 4.E.6	Arrangements for transportation of contaminated injured individuals from the site to specifically identified treatment facilities outside the site boundary;	L.4		
IV 4.E.7	Arrangements for treatment of individuals injured in support of licensed activities on the site at treatment facilities outside the site boundary;	L.1		
IV 4.E.8	A licensee onsite technical support center and a licensee near-site emergency operations facility from which effective direction can be given and effective control can be exercised during an emergency;	H.1, H.2		
IV 4.E.9	At least one onsite and one offsite communications system; each system shall have a backup power source. All communication plans shall have arrangements for	F.1		

TABLE 1
10CFR50 Appendix E Emergency Preparedness Cross Reference

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
	emergencies, including titles and alternates for those in charge at both ends of the communication links and the primary and backup means of communication.			
IV 4.E.9.a	Where consistent with the function of the governmental agency, these arrangements will include: Provision for communications with contiguous State/local governments within the plume exposure pathway EPZ. Such communications shall be tested monthly.	N.2		
IV 4.E.9.b	Provision for communications with Federal emergency response organizations. Such communications systems shall be tested annually.	N.2		
IV 4.E.9.c	Provision for communications among the nuclear power reactor control room, the onsite technical support center, and the near-site emergency operations facility; and among the nuclear facility, the principal State and local emergency operations centers, and the field assessment teams. Such communications systems shall be tested annually.	N.2		
IV 4.E.9.d	Provisions for communications by the licensee with NRC Headquarters and the appropriate NRC Regional Office Operations Center from the nuclear power reactor control room, the onsite technical support center, and the near-site emergency operations facility. Such communications shall be tested monthly.	N.2		
IV F.1.i	The program to provide for: (a) The training of employees and exercising, by periodic drills, of radiation emergency plans to ensure that employees of the licensee are familiar with their specific emergency response duties, and (b) The participation in the training and drills by other persons whose assistance may be needed in the event of a radiation emergency shall be described. This shall include a description of specialized initial training and periodic retraining programs to be provided to each of the following categories of emergency personnel: Directors and/or coordinators of the plant emergency organization;	O.2 O.4.a		
IV F.1.ii	Personnel responsible for accident assessment, including control room shift personnel;	O.4.b		
IV F.1.iii	Radiological monitoring teams;	O.4.c		
IV F.1.iv	Fire control teams (fire brigades);	O.4.d		

TABLE 1
10CFR50 Appendix E Emergency Preparedness Cross Reference

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
IV F.1.v	Repair and damage control teams;	O.4.e		
IV F.1.vi	First aid and rescue teams;	O.4.f		
IV F.1.vii	Medical support personnel;	O.4.h		
IV F.1.viii	Licensee's headquarters support personnel;	O.4.i		
IV F.1.ix	Security personnel.	O.4.d.2		
IV F.1	In addition, a radiological orientation training program shall be made available to local services personnel; e.g., local emergency services/Civil Defense, local law enforcement personnel, local news media persons.	O.4.g G.5, P.3		
IV F.2	The plan shall describe provisions for the conduct of emergency preparedness exercises as follows: Exercises shall test the adequacy of timing and content of implementing procedures and methods, test emergency equipment and communications networks, test the public notification system, and ensure that emergency organization personnel are familiar with their duties.	N.1		
IV F.2.a	A full participation exercise which tests as much of the licensee, State and local emergency plans as is reasonably achievable without mandatory public participation shall be conducted for each site at which a power reactor is located.	N.1		
IV F.2.b	Each licensee at each site shall conduct an exercise of its onsite emergency plan every 2 years. The exercise may be included in the full participation biennial exercise required by paragraph 2.c. of this section. In addition, the licensee shall take actions necessary to ensure that adequate emergency response capabilities are maintained during the interval between biennial exercises by conducting drills, including at least one drill involving a combination of some of the principal functional areas of the licensee's onsite emergency response capabilities.	N.1		
IV F.2.c	Offsite plans for each site shall be exercised biennially with full participation by each offsite authority having a role under the plan. Where the offsite authority has a role under a radiological response plan for more than one site, it shall fully participate in one exercise every two years and shall, at least, partially participate in other offsite plan exercises in this period.	N.1		
IV F.2.d	A State should fully participate in the ingestion pathway portion of exercises at least once every six years. In States with more than one site, the State should rotate	N.1 a		

TABLE 1
10CFR50 Appendix E Emergency Preparedness Cross Reference

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
	this participation from site to site.			
IV F.2.e	Licensees shall enable any State or local Government located within the plume exposure pathway EPZ to participate in the licensee's drills when requested by such State or local Government.	N.1.b		
IV F.2.f	Remedial exercises will be required if the emergency plan is not satisfactorily tested during the biennial exercise, such that NRC, in consultation with FEMA, cannot find reasonable assurance that adequate protective measures can be taken in the event of a radiological emergency. The extent of State and local participation in remedial exercises must be sufficient to show that appropriate corrective measures have been taken regarding the elements of the plan not properly tested in the previous exercises.	N.1.a		
IV F.2.g	All training, including exercises, shall provide for formal critiques in order to identify weak or deficient areas that need correction. Any weaknesses or deficiencies that are identified shall be corrected.	N.4, N.5		
IV F.2.h	The participation of State and local governments in an emergency exercise is not required to the extent that the applicant has identified those governments as refusing to participate further in emergency planning activities, pursuant to 10 CFR 50.47(c)(l). In such cases, an exercise shall be held with the applicant or licensee and such governmental entities as elect to participate in the emergency planning process.	N/A		
IV G	Provisions to be employed to ensure that the emergency plan, its implementing procedures, and emergency equipment and supplies are maintained up to date shall be described.	P.3		
IV H	Criteria to be used to determine when, following an accident, reentry of the facility would be appropriate or when operation could be resumed shall be described.	M.1.a		

TABLE 2
10CFR50.47 Emergency Preparedness Cross Reference

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
(b) 1	The onsite and, except as provided in paragraph (d) of this section, offsite emergency response plans for nuclear power reactors must meet the following standards: Primary responsibilities for emergency response by the nuclear facility licensee and by State and local organizations within the Emergency Planning Zones have been assigned,	A.1		
(b) 1 (continued)	the emergency responsibilities of the various supporting organizations have been specifically established,	A.1		
(b) 1 (continued)	and each principal response organization has staff to respond and to augment its initial response on a continuous basis.	A.4		
(b) 2	On-shift facility licensee responsibilities for emergency response are unambiguously defined,	B.1		
(b) 2 (continued)	timely augmentation of response capabilities is available	B.5.a		
(b) 2 (continued)	and the interfaces among various onsite response activities and offsite support and response activities are specified.	Figure A-2		
(b) 3	Arrangements for requesting and effectively using assistance resources have been made,	A.3		
(b) 3 (continued)	arrangements to accommodate State and local staff at the licensee's near-site Emergency Operations Facility have been made,	C.2		
(b) 3 (continued)	and other organizations capable of augmenting the planned response have been identified.	C.4		
(b) 4	A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee,	D.1		
(b) 4 (continued)	and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.	E.2.b		
(b) 5	Procedures have been established for notification, by the licensee, of State and local response organizations	E.2.b		
(b) 5 (continued)	and for notification of emergency personnel by all organizations;	E.2		
(b) 5 (continued)	the content of initial and follow up messages to response	E.3, E.4		

TABLE 2
10CFR50.47 Emergency Preparedness Cross Reference

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
	organizations and the public has been established;			
(b) 5 (continued)	and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established.	E.6		
(b) 6	Provisions exist for prompt communications among principal response organizations to emergency personnel	F.1		
(b) 6 (continued)	and to the public.			
(b) 7	Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors),	G.1		
(b) 7 (continued)	the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance,	G.2		
(b) 7 (continued)	and procedures for coordinated dissemination of information to the public are established.	G.3, G.4		
(b) 8	Adequate emergency facilities and equipment to support the emergency response are provided and maintained.	H.1, H.2, H.3		
(b) 9	Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.	I		
(b) 10	A range of protective actions have been developed for the plume exposure pathway EPZ for emergency workers and the public.	J		
(b) 10 (continued)	Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place,	J.10.m.1, Figure J-2		
(b) 10 (continued)	and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.	J.11		
(b) 11	Means for controlling radiological exposures, in an emergency, are established for emergency workers.	K.1		
(b) 11 (continued)	The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides.	K.1		

TABLE 2
10CFR50.47 Emergency Preparedness Cross Reference

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
(b) 12	Arrangements are made for medical services for contaminated injured individuals.	L.1		
(b) 13	General plans for recovery and reentry are developed.	M.1		
(b) 14	Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities,	N.1, N.2		
(b) 14 (continued)	periodic drills are (will be) conducted to develop and maintain key skills,	N.2		
(b) 14 (continued)	and deficiencies identified as a result of exercises or drills are (will be) corrected.	N.5		
(b) 15	Radiological emergency response training is provided to those who may be called on to assist in an emergency.	O.1, O.2, O.3, O.4, O.5		
(b) 16	Responsibilities for plan development and review and for distribution of emergency plans are established,	P		
(b) 16 (continued)	and planners are properly trained.	P.1		

TABLE 3
NUREG-0696 Functional Criteria for Emergency Response Facilities

NUREG-0696 Section #	STATEMENT	EPLAN	OTHER	COMMENTS
2.1	The **TECHNICAL SUPPORT CENTER (TSC)** provides management, technical and administrative support to the Control Room during an emergency of Alert or higher classification..	B.5		
2.2	The TSC is the primary communications center for the Plant during an emergency.	H.1.b		
2.2	The TSC is located near the Control Room (within a two minute walk)	H.1.b		
2.2	There are no major security barriers between the Control Room and the TSC.	H.1.b		
2.3	Staffing and training:			
	Activate within 30 minutes after staffing	H.4		
	Staffing shall consist of sufficient technical, engineering and senior designated licensee personnel	B.5		
	Staffing per emergency classification	B.5		
	Training of TSC staff to support facility operation	O.2, O.5		
2.4	Size of the Facility	H.1.b		
	Approximately 75 sq. ft. / person	H.1.b		
	Acquire, process and display data	H.1.b		
	Space to repair, maintain and service of equipment, displays and instrumentation	H.1.b		
	Personnel access to the functional displays	H.1.b		
	Communications and transmission device/links	H.1.b		
	Storage of and/or access to plant records	H.1.b		
	A separate room (for 3 individuals) for NRC private consultation.	H.1.b		
2.5	Structure	H.1.b		
	Adequate capabilities for earthquakes; high winds (other than tornadoes);and floods	H.1.b		
2.6	Habitability	H.1.b		
	Same radiological protection as the Control Room under accident conditions	H.1.b		
	Ventilation system functions in a manner similar to the Control Room ventilation system.	H.1.b		
	Radiological Monitoring dedicated to the TSC	H.1.b		
2.7	Communications	F.1		
	ENS	F.1		

TABLE 3
NUREG-0696 Functional Criteria for Emergency Response Facilities

NUREG-0696 Section #	STATEMENT	EPLAN	OTHER	COMMENTS
	HPN	F.1		
	Dedicated links to the Control Room(s), OSC and the EOF	F.1		
	Between work areas in the TSC	F.1		
	At least two dial phones for the NRC	F.1		
3.1	The **OPERATIONS SUPPORT CENTER (OSC)**	H.1.c		
	A location where logistical support is assembled	H.1.c		
	Supervise personnel designated to fill these roles	H.1.c		
3.2	Habitability	H.1.c		
	No requirements, ability to relocate	H.1.c		
3.3	Communications	F.1		
	Control Room	F.1		
	Technical Support Center	F.1		
	The **EMERGENCY OPERATIONS FACILITY (EOF)**	H.2		
4.1	Functions			
	Overall management of emergency response	B.5		
	Coord. Radiological & environmental assessments	B.5		
	Determine PARs	B.5		
	Coordination with the offsite agencies and authorities	B.5		
	Staffed by licensee, Federal, state	B.5		
	Acquisition, display and evaluation of all radiological and meteorological and plant systems pertinent to determine offsite protective measures	B.5		
	Coord with the offsite authorities	B.5		
	Industrial security provided to restrict access	B.5		
4.2	Location, Structure and Habitability	H.2		
	Optimum functionality	H.2		
	Affected or interrupted by radiological releases	H.2		
	Habitability & location per table 2	H.2		
	Distance beyond 10 miles of the TSC	H.2		
	Well designed for the life of the plant	H.2		
4.3	Staffing and training	B.5, O.2, O.5		
4.4	Size	H.2		
	Approximately 75 sq. ft. / person	H.2		

TABLE 3
NUREG-0696 Functional Criteria for Emergency Response Facilities

NUREG-0696 Section #	STATEMENT	EPLAN	OTHER	COMMENTS
	Acquire, process and display data	H.2		
	Space to repair, maintain and service of equipment, displays and instrumentation	H.2		
	Personnel access to the functional displays	H.2		
	Communications and transmission device/links	H.2		
	Storage of and/or access to plant records	H.2		
	A separate room (for 3 individuals) for NRC private consultation.	H.2		
	>35 response personnel (unless state and locals respond to the EOF)	H.2		
	9 NRC	H.2		
	1 FEMA	H.2		
4.5	Radiological Monitoring	H.2		
	Adequate radiological protection for the responders	H.2		
4.6	Communications			
	EOF to senior licensee manager in charge in TSC	F.1		
	Communication to manage the licensee emergency response resources	F.1		
	Communication to coordinate radiological monitoring	F.1		
	Communication to coordinate offsite emergency response activities	F.1		
	Communication to disseminate information and recommend protective actions to responsible government agencies	F.1		
	Communications include:	F.1		
	ENS	F.1		
	HPN	F.1		

TABLE 4
10 CFR 50.33 Contents of Applications; General Information

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
10 CFR 50.33 (g)	(g) If the application is for an operating license for a nuclear power reactor, the applicant shall submit radiological emergency response plans of State and local governmental entities in the United States that are wholly or partially within the plume exposure pathway Emergency Planning Zone (EPZ)[(3)], as well as the plans of State governments wholly or partially within the ingestion pathway EPZ.[(4)] Generally, the plume exposure pathway EPZ for nuclear power reactors shall consist of an area about 10 miles (16 km) in radius and the ingestion pathway EPZ shall consist of an area about 50 miles (80 km) in radius. The exact size and configuration of the EPZs surrounding a particular nuclear power reactor shall be determined in relation to the local emergency response needs and capabilities as they are affected by such conditions as demography, topography, land characteristics, access routes, and jurisdictional boundaries. The size of the EPZs also may be determined on a case-by-case basis for gas-cooled reactors and for reactors with an authorized power level less than 250 MW thermal. The plans for the ingestion pathway shall focus on such actions as are appropriate to protect the food ingestion pathway.	N/A		

	[3] Emergency Planning Zones (EPZs) are discussed in NUREG-0396, EPA 520/1-78-016, "Planning Basis for the Development of State and Local Government Radiological Emergency Response Plans in Support of Light- Water Nuclear Power Plants," December 1978. [4] If the State and local emergency response plans have been previously provided to the NRC for inclusion in the facility docket, the applicant need only provide the appropriate reference to meet this requirement.			
REGULATION	**STATEMENT**	**EPLAN**	**OTHER**	**COMMENTS**
10 CFR 50.33 (j)	(j) If the application contains Restricted Data or other defense information, it shall be prepared in such manner that all Restricted Data and other defense information are separated from the unclassified information.	N/A		No restrictions known

TABLE 5
10 CFR 50.34 Contents of Applications; General Information

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
10 CFR 50.34	(a) (a) *Preliminary safety analysis report*. Each application for a construction permit shall include a preliminary safety analysis report. The minimum information[5] to be included shall consist of the following: (10) (10) A discussion of the applicant's preliminary plans for coping with emergencies. Appendix E sets forth items which shall be included in these plans.	N/A	SAR	
	(b)(6)(v) Plans for coping with emergencies, which shall include the items specified in appendix E.	Emergency Plan complies see Appendix E Cross Reference		
	(f) (2) (xxv) Provide an onsite Technical Support Center, an onsite Operational Support Center, and, for construction permit applications only, a nearsite Emergency Operations Facility. (III.A.1.2).	Sections H.1, H.2		

TABLE 6
10 CFR 50.54 Conditions of Licenses

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
10 CFR 50.54(q)	(q) A licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in § 50.47(b) and the requirements in appendix E of this part. A licensee authorized to possess and/or operate a research reactor or a fuel facility shall follow and maintain in effect emergency plans which meet the requirements in appendix E to this part. The licensee shall retain the emergency plan and each change that decreases the effectiveness of the plan as a record until the Commission terminates the license for the nuclear power reactor. The nuclear power reactor licensee may make changes to these plans without Commission approval only if the changes do not decrease the effectiveness of the plans and the plans, as changed, continue to meet the standards of § 50.47(b) and the requirements of appendix E to this part. The research reactor and/or the fuel facility licensee may make changes to these plans without Commission approval only if these changes do not decrease the effectiveness of the plans and the plans, as changed, continue to meet the requirements of appendix E to this part. This nuclear power reactor, research reactor, or fuel facility licensee shall retain a record of each change to the emergency plan made without prior Commission approval for a period of three years from the date of the change. Proposed changes that decrease the effectiveness of the approved emergency plans may not be implemented without application to and approval by the Commission. The licensee shall submit, as specified in § 50.4, a report of each proposed change for approval. If a change is made without approval, the licensee shall submit, as specified in § 50.4, a report of each change within 30 days after the change is made.	N/A	Procedural Guidance to be provided.	

TABLE 6
10 CFR 50.54 Conditions of Licenses

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
10 CFR 50.54(q)	(t)(1) The licensee shall provide for the development, revision, implementation, and maintenance of its emergency preparedness program. The licensee shall ensure that all program elements are reviewed by persons who have no direct responsibility for the implementation of the emergency preparedness program either: (i) At intervals not to exceed 12 months or, (ii) As necessary, based on an assessment by the licensee against performance indicators, and as soon as reasonably practicable after a change occurs in personnel, procedures, equipment, or facilities that potentially could adversely affect emergency preparedness, but no longer than 12 months after the change. In any case, all elements of the emergency preparedness program must be reviewed at least once every 24 months. (2) The review must include an evaluation for adequacy of interfaces with State and local governments and of licensee drills, exercises, capabilities, and procedures. The results of the review, along with recommendations for improvements, must be documented, reported to the licensee's corporate and plant management, and retained for a period of 5 years. The part of the review involving the evaluation for adequacy of interface with State and local governments must be available to the appropriate State and local governments.	P.9 P.9 P.9		

TABLE 7

10 CFR 50.72 Immediate Notification Requirements For Operating Nuclear Power Reactors.

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
10 CFR 50.72	(a) General requirements.[1] (1) Each nuclear power reactor licensee licensed under Sec. 50.21(b) or Sec. 50.22 of this part shall notify the NRC Operations Center via the Emergency Notification System of: (i) The declaration of any of the Emergency Classes specified in the licensee's approved Emergency Plan;	E.3		
	(2) If the Emergency Notification System is inoperative, the licensee shall make the required notifications via commercial telephone service, other dedicated telephone system, or any other method which will ensure that a report is made as soon as practical to the NRC Operations Center.	F.1.f		
	(3) The licensee shall notify the NRC immediately after notification of the appropriate State or local agencies and not later than one hour after the time the licensee declares one of the Emergency Classes.	E.3		
	(4) The licensee shall activate the Emergency Response Data System (ERDS) [4] as soon as possible but not later than one hour after declaring an Emergency Class of alert, site area emergency, or general emergency. The ERDS may also be activated by the licensee during emergency drills or exercises if the licensee's computer system has the capability to transmit the exercise data.	F.1.d.5		

TABLE 7

10 CFR 50.72 Immediate Notification Requirements For Operating Nuclear Power Reactors.

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
10 CFR 50.72	(c) *Followup notification*. With respect to the telephone notifications made under paragraphs (a) and (b) of this section, in addition to making the required initial notification, each licensee, shall during the course of the event: (1) *Immediately report* (i) any further degradation in the level of safety of the plant or other worsening plant conditions, including those that require the declaration of any of the Emergency Classes, if such a declaration has not been previously made, or (ii) any change from one Emergency Class to another, or (iii) a termination of the Emergency Class. (3) Maintain an open, continuous communication channel with the NRC Operations Center upon request by the NRC.	E.4 E.3 F.1.f		

TABLE 8
10 CFR 52.79 Contents of Applications; Technical Information in Final Safety Analysis Report

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
10 CFR 52.79	(c) The application for a combined license must include the proposed inspections, tests and analyses, including those applicable to emergency planning, which the licensee shall perform and the acceptance criteria therefore which are necessary and sufficient to provide reasonable assurance that, if the inspections, tests and analyses are performed and the acceptance criteria met, the facility has been constructed and will operate in conformity with the combined license, the provisions of the Atomic Energy Act, and the NRC's regulations. Where the application references a certified standard design, the inspections, tests, analyses and acceptance criteria contained in the certified design must apply to those portions of the facility design which are covered by the design certification.	N/A	ITAAC	Part of the application.
10 CFR 52.79	(d) The application must contain emergency plans which provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency at the site. (1) If the application references an early site permit, the application may incorporate by reference emergency plans, or major features of emergency plans, approved in connection with the issuance of the permit.	N/A		Licensing action to include the Emergency Plan with the COLA
10 CFR 52.79	(d) (2) If the application does not reference an early site permit, or if no emergency plans were approved in connection with the issuance of the permit, the applicant shall make good faith efforts to obtain certifications from the local and State governmental agencies with emergency planning responsibilities (i) that the proposed emergency plans are practicable, (ii) that these agencies are committed to participating in any further development of the plans, including any required field demonstrations, and (iii) that these agencies are committed to executing	N/A	Letters of Certification	Licensing action. To be included with the ER early submittal or with the COLA.

TABLE 8
10 CFR 52.79 Contents of Applications; Technical Information in Final Safety Analysis Report

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
	their responsibilities under the plans in the event of an emergency. The application must contain any certifications that have been obtained. If these certifications cannot be obtained, the application must contain information, including a utility plan, sufficient to show that the proposed plans nonetheless provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency at the site.			

TABLE 9
10 CFR 52.77 Contents of Applications; General Information

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
10 CFR 52.77	The application must contain all of the information required by 10 CFR 50.33, as that section would apply to applicants for construction permits and operating licenses.	N/A		

TABLE 10
10 CFR 52.80 Contents of Applications; Additional Technical Information

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
10 CFR 52.80	(a) A plant-specific probabilistic risk assessment (PRA). If the application references a standard design certification or standard design approval, or if the application proposes to use a nuclear power reactor manufactured under a manufacturing license under subpart F of this part, the plant-specific PRA must use the PRA for the design certification, design approval, or manufactured reactor, as applicable, and must be updated to account for site-specific design information and any design changes, departures, or variances.	N/A		
	(b) The proposed inspections, tests, and analyses, including those applicable to emergency planning, that the licensee shall perform, and the acceptance criteria which are necessary and sufficient to provide reasonable assurance that, if the inspections, tests, and analyses are performed and the acceptance criteria met, the facility has been constructed and will operate in conformity with the combined license, the provisions of the Atomic Energy Act, and the NRC's regulations.	N/A	ITAAC	
	(1) If the application references an early site permit with ITAAC, the early site permit ITAAC must apply to those aspects of the combined license which are approved in the early site permit.	N/A	ITAAC	
	(2) If the application references a standard design certification, the ITAAC contained in the certified design must apply to those portions of the facility design which are approved in the design certification.	N/A	ITAAC	
	(3) If the application references an early site permit with ITAAC or a standard design certification or both, the application may include a notification that a required inspection, test, or analysis in the ITAAC has been successfully completed and that the corresponding acceptance criterion has been met. The **Federal Register** notification required by § 52.85 must indicate that the application includes this notification.	N/A	N/A	

TABLE 10
10 CFR 52.80 Contents of Applications; Additional Technical Information

REGULATION	STATEMENT	EPLAN	OTHER	COMMENTS
10 CFR 100	.1 (c) Siting factors and criteria are important in assuring that radiological doses from normal operation and postulated accidents will be acceptably low, that natural phenomena and potential man-made hazards will be appropriately accounted for in the design of the plant, that site characteristics are such that adequate security measures to protect the plant can be developed, and that physical characteristics unique to the proposed site that could pose a significant impediment to the development of emergency plans are identified.	N/A	N/A	
10CFR100.21	(g) Physical characteristics unique to the proposed site that could pose a significant impediment to the development of emergency plans must be identified;	N/A	N/A	

Supplemental Information 3

State and County 10 CFR 52.79(a)(22) Certification Letters

STATE OF FLORIDA
DIVISION OF EMERGENCY MANAGEMENT

CHARLIE CRIST
Governor

RUBEN D. ALMAGUER
Interim Director

May 29, 2009

Mr. Martin Gettler
Vice President, New Nuclear Projects
Florida Power & Light Company
700 Universe Blvd.
Juno Beach, Florida 33408

Dear Mr. Gettler:

The Division of Emergency Management (Division) has received a copy of the Turkey Point Emergency Plan and the evacuation time estimate study to support the Combined Operating License Application for two proposed additional nuclear generating units at Turkey Point. The Division concurs with the proposed emergency classification system, initiating conditions, and emergency action levels described in the plan. The Division has also reviewed the updated evacuation time estimate study and concurs with the information contained in the study.

It is our understanding that the Combined Operating License Application is being developed in accordance with 10 Code of Federal Regulation (CFR) 52 and will be submitted to the Nuclear Regulatory Commission within the next few months. Emergency planning provisions of 10 CFR 52 and the application process require Florida Power & Light to obtain certifications (assurances) from local and state governmental agencies with emergency planning responsibilities that the agency will participate in emergency planning and support emergency response to the proposed new units, if constructed. Therefore, pursuant to section 252.60, Florida Statutes, the Division provides the following assurances:

- The proposed emergency plan is a thorough, practical, and useful tool for use in managing real life events;
- The Division will fully participate in the continuing planning efforts and scheduled field demonstrations for this emergency plan;
- The Division is committed to leading the effort to ensure that the health and safety of the public is maintained as the highest priority in the implementation and continued improvement of the emergency preparedness and response plans for the Turkey Point Nuclear Power Plant; and
- The Division is committed to executing our responsibilities under the plans in the event of an emergency.

FLORIDA RECOVERY OFFICE • DIVISION HEADQUARTERS • STATE LOGISTICS RESPONSE CENTER
36 Skyline Drive, Lake Mary, FL 32746-6201
2555 Shumard Oak Boulevard, Tallahassee, FL 32399-2100
2702 Directors Row, Orlando, FL 32809-5631
Tel: 850-413-9969 • Fax: 850-488-1016
www.FloridaDisaster.org

Over the years, the Division has maintained a successful working partnership with Florida Power & Light in support of both the Turkey Point and St. Lucie Nuclear Power Plants. It is our commitment to support emergency preparedness for this as well as all hazards that may potentially impact the citizens of Florida. Therefore, we will continue to work with Florida Power & Light and the counties in their planning efforts for the proposed new units at Turkey Point. If you have any questions, please contact Michael Younger at (850) 413-9922.

Respectfully,

Ruben D. Almaguer
Interim Director

RDA/my

MIAMI-DADE COUNTY

Carlos Alvarez, Mayor

Emergency Management &
Homeland Security
9300 NW 41 Street
Doral, Florida 33178-2414
T 305-468-5400 F 305-468-5401

miamidade.gov

June 1, 2009

Mr. Martin Gettler
Vice President, New Nuclear Projects
Florida Power and Light Company
700 Universe Blvd.
Juno Beach, FL 33408

Dear Mr. Gettler:

The Miami-Dade County Department of Emergency Management (DEM) has reviewed the PTN Emergency Plan supporting the Combined Operating License Application for two (2) proposed new generating units at Turkey Point. DEM believes the proposed emergency plan is practicable. DEM has also reviewed the updated Evacuation Time Estimate and concurs with information in the final report prepared by FPL.

FPL has advised DEM that it is developing a Combined Operating License Application in accordance with 10 CFR 52 and that it will be submitting such application to the Nuclear Regulatory Commission within the next year. FPL has further advised DEM that the planning provisions of 10 CFR 52 and the application process require Florida Power and Light (FPL) to obtain certifications (assurances) from local and state governmental agencies with emergency planning responsibilities that the agency will participate in emergency planning and support emergency response to the proposed new units, if constructed. Therefore, pursuant to section 252.60, Florida Statutes, the Miami-Dade County Department of Emergency Management provides the following assurances:

- The proposed emergency plan is an adequate plan for use in managing real life events;
- The Department of Emergency Management will fully participate in the continuing planning efforts and scheduled field demonstrations for this Emergency Plan;
- The Department of Emergency Management is committed to executing its responsibilities under the plans in the event of an emergency.

Over the years, the Department of Emergency Management has maintained a successful working partnership with FPL relating to Turkey Point Units 3 and 4. It is our commitment to support emergency preparedness for this as well as all hazards that may potentially impact the residents and visitors of Miami-Dade County, Florida.

It is our understanding that the specific nature of arrangements in support of emergency preparedness for operation of the proposed new nuclear units will be clearly established in a properly executed and binding letter of agreement that will be included in the Emergency Plan, if and when FPL proceeds with construction and operation of the new units.

Please do not hesitate to contact me if I can be of further assistance.

Sincerely,

Curt Sommerhoff
Director

Monroe
County
Emergency
Management

490 63rd St. Ocean
Suite 150
Marathon, FL 33050

Ph: 305-289-6018
Fax: 305-289-6333

May 14, 2009

Mr. Martin Gettler
Vice President, New Nuclear Projects
Florida Power and Light Company
700 Universe Blvd.
Juno Beach, FL 33408

Dear Mr. Martin.

The Monroe County Department of Emergency Management has reviewed the PTN Emergency Plan supporting the Combined Operating License Application for two (2) proposed new generating units at Turkey Point and we believe that the proposed emergency plan, in its' entirety, is practicable.

It is our understanding that the Combined Operating License Application is being developed in accordance with 10CFR 52 and will be submitted to the Nuclear Regulatory Commission within the next year. Emergency planning provisions of 10 CFR 52 and the application process require Florida Power and Light (FPL) to obtain certifications (assurances) from local and state governmental agencies with emergency planning responsibilities that the agency will participate in emergency planning and support emergency response to the proposed new units, if constructed.

Based on our opinion that the proposed emergency plan is thorough, practical, and useful tool in addressing radiological emergency preparedness and pursuant to S. 252.38 (1), F.S., and S. 252.60., the Monroe County Department of Emergency Management provides the following assurances:

- The proposed emergency plan is a thorough, practical, and useful tool for use in managing real life events;
- The Emergency Management Department will fully participate in the continuing planning efforts and scheduled field demonstrations for this Emergency Plan;
- The Emergency Management Department is committed to leading the effort to ensure that the health and safety of the public is maintained as the highest priority in the implementation and continued improvement of the emergency preparedness and response plans for the Turkey Point Nuclear Power Plant site; and
- The Emergency Management Department is committed to executing our responsibilities under the plans in the event of an emergency

Over the years, the Monroe County Department of Emergency Management has maintained a successful working partnership with FPL in support of Turkey Point Units 3 and 4. It is our commitment to support emergency preparedness for this as well as all hazards that may potentially impact the citizens of Monroe County. Therefore, we will continue to work with FPL and the Florida State in their planning efforts for the proposed new units at the Turkey Point site.

It is our understanding that the specific nature of arrangements in support of emergency preparedness for operation of the proposed new nuclear units will be clearly established in a properly executed and binding letter of agreement that will be included in the Emergency Plan, if and when FPL proceeds with construction and operation of the new units.

Sincerely,

Irene Toner, FPEM, CHS-III, CPM
Director
Monroe County Emergency Management

Supplemental Information 4

Letters of Agreement

1. Letter from URS Washington Division dated September 8, 2008 (1 page)
2. Letter from AREVA dated August 29, 2009 (2 pages)
3. Letter from Baptist Hospital of Miami dated September 3, 2009 (1 page)
4. Letter from Bechtel Power Corporation dated September 12, 2008 (2 pages)
5. Letters from Florida Highway Safety and Motor Vehicles dated September 12, 2008 and September 3, 2008 (2 pages)
6. Letter from the Department of Energy dated September 3, 2008 (1 page)
7. Letter from National Nuclear Security Administration dated September 11, 2008 (1 page)
8. Letter from INPO dated September 30, 2008 (1 page)
9. Letter from Monroe County Sheriff's Office dated September 2, 2008 (1 page)
10. Letter from the Miami-Dada Fire Rescue Department dated September 5, 2008 (3 pages)
11. Letter from Mercy Hospital dated December 4, 2008 (2 pages)
12. FPL Inter-Office Correspondence dated October 16, 2009 (1 page)
13. Letter from US Department of Homeland Security United States Coast Guard dated September 29, 2008 (4 pages)
14. Letter from Miami-Dade Police Department dated September 20, 2009 (1 page)

URS
Washington Division

September 8, 2008

Mr. Mitch Epstein
Emergency Preparedness Coordinator
Florida Power & Light Company
Turkey Point Nuclear Power Plant
9760 SW 344 Street
Florida City, FL 33035

Dear Mr. Epstein:

URS Washington Division confirms its commitment to support Florida Power & Light in event of an emergency at the Turkey Point Nuclear Power Plant. In the event of such an emergency, your point of contact will now be:

John DeBruin
Vice President, Nuclear Engineering
(803) 578-7013 Office
(857) 205-6875 Cell
Email: john.debruin@wgint.com

Please feel free to contact me if you have any questions.

Sincerely,

John A. Simmons
Senior Vice President
803-578-7015

URS Corporation
URS Nuclear Center
3023 HSBC Way
Fort Mill, SC 29715-6551
Tel: 803.578.7000
Fax: 803.578.7503

AREVA

August 29, 2008
AREVA-08-02874

Mr. Larry Hardin
Emergency Preparedness Manager
Florida Power & Light
Turkey Point Nuclear Station
9760 SW 344 Street
Homestead, FL 33035

Subject: Turkey Point Nuclear Plant Emergency Plan Letter of Agreement

Reference: Email Request from Larry Hardin (Julie Wingate)

Dear Mr. Hardin:

In response to the reference email, I would like to take this opportunity to confirm that AREVA NP commits to provide assistance to Florida Power & Light (FPL) in the event of an emergency at your Turkey Point or St. Lucie Nuclear Plants. Services will be provided by AREVA NP to FPL upon request and authorization by an official representative of FPL in accordance with our existing Outage Services Agreement.

The designated point of contact at AREVA NP is Skip Hudson, J.W. Page and Mark Lukowski as first and second alternates respectively. Skip is located in Singer Island, Florida while J.W. and Mark are located in the AREVA NP office in Lynchburg, Virginia. Our contact numbers are listed below

		Office	Home	Cell
Primary Contact	C.J. Hudson	(561) 841-9174	(561) 845-5271	(561) 371-3583
First Alternate	J.W. Page	(434) 832-2447	(434) 525-4840	(434) 841-1167
Second Alternate	Mark Lukowski	(434) 832-2645	(434) 525-3491	(434) 841-4203

AREVA NP can provide engineering, technical support, and field services to assist FPL in the management and control of an emergency. Any request to AREVA NP point of contact from designated FPL officials will be responded to as expeditiously as practical to support the FPL needs.

Should you require any further clarification, please contact me at (434) 832-2447

Sincerely,

J W Page

JW Page
Project Manager

CC: C.J. Hudson

AREVA NP INC.
An AREVA and Siemens company

3315 Old Forest Road, Lynchburg, VA 24501
Tel : (434) 832-3700 – FAX : (434) 832-3840 www.areva.com

AREVA

M. Lukowski

AREVA NP INC.
An AREVA and Siemens company

3315 Old Forest Road, Lynchburg, VA 24501
Tel : (434) 832-3700 – FAX : (434) 832-3840 www.areva.com

Baptist Hospital of Miami

8900 North Kendall Drive
Miami, Florida 33176-2197
Tel: 786-596-1960
www.baptisthealth.net

September 3, 2008

Milt Murray
Emergency Preparedness Department
Turkey Point Nuclear Plant
9760 SW 344 Street
Florida City, FL 33035

Dear Mr. Murray:

The following is the information stating our support, capabilities and resources available to you in the event of an emergency at one of your nuclear plants.

1. Scope of Service:

A) Baptist Hospital is prepared to provide emergency medical services for FPL's Turkey Point Nuclear Plant for the diagnosis and treatment of injuries accompanied by radiological contamination, or actual or alleged injury due to radiation exposure.

B) Baptist Hospital shall maintain an on-call roster of qualified physicians who shall be available in the event of an emergency.

C) Baptist Hospital's Emergency Physicians shall provide emergency treatment and services without delay at our facility on a 24 hour/7 day/week basis, for FPL employees and any other person designated by FPL who may have been involved in a radiation incident.

2. Physician Contact:

Paul A. Andrulonis, MD
Medical Director for Emergency Services
Baptist Hospital Emergency Department
8900 N. Kendall Drive
Miami, FL 33176
Office: 786-596-6284
Cell: 215-990-5605

3. Hospital Contact:

Nursing Supervisor on Duty
786-594-9403
(Call to notify 24 hours/day)

Baptist Hospital will continue to cooperate in every way possible in the radiation emergency preparedness program. If there is anything further you require or if we can be of assistance in any way, please do not hesitate to contact us.

Becky Montesino

Becky Montesino, RN, BSN, MS
Vice President/
Chief Nursing Officer

Paul A. Andrulonis, MD
Medical Director
Emergency Department

An ANCC Magnet Hospital:
Recognized for excellence in nursing.

September 12, 2008

Mr. Milt Murray
Emergency Planning Coordinator
Turkey Point, Florida Power & Light Company
9760 South West 344th Street
Florida City, FL 33035

Subject: Turkey Point Nuclear Plant
Bechtel Job No. 24653
Emergency Response Assistance
NOPS 24653-2008-00001 File: 0260

Dear Mr. Murray:

Enclosed is the latest Bechtel emergency contact list for your use

If you have any questions, please do not hesitate to contact me at (301) 228-6236 or e-mail bdilodare@bechtel.com..

Sincerely,

Basant K. Dilodare
Project Manager

BKD/alc

Enclosure: Emergency Contact List

LIST OF HOME TELEPHONE NUMBERS
BECHTEL KEY RESPONSE TEAM MEMBERS

September 12, 2008

Home Office {Frederick, Maryland} Representatives

Name	Title	Home Phone #
Basant Dilodare	Project Manager, Nuclear	301-694-9358 240-344-0471
Ran Patel	Project Engineer	301-916-0250 240-506-9794
Gene Thomas	Engineering Manager	301-865-0002

Turkey Point Site Representative

None

St. Lucie Site Representative

None

Frederick Main Office Number	301-228-6000
Frederick Main Office Guard's Desk	301-228-7751 {Attended during non-business hours}

Electra Theodorides-Bustle
Executive Director

2900 Apalachee Parkway
Tallahassee, Florida 32399-0500
www.flhsmv.gov

A SAFER
FLORIDA
HIGHWAY SAFETY AND MOTOR VEHICLES

Charlie Crist
Governor

Bill McCollum
Attorney General

Alex Sink
Chief Financial Officer

Charles H. Bronson
Commissioner of Agriculture

September 12, 2008

FPL Turkey Point Nuclear Plant
Attn: Larry Hardin
9460 SW 344th Street
Florida City, FL 33035

RE: FHP Policy 16.01

Dear Mr. Hardin,

In response to your e-mail request dated August 28, 2008 the Department of Highway Safety and Motor Vehicles, Division of the Florida Highway Patrol remains in agreement with FHP Policy Number 16.01 dated July 1, 2007. All referenced information remains the same.

If you have any questions regarding the policy please contact Lt. Kelly Hildreth at (850) 617-2368. If I can be of further assistance please feel free to contact me at (850) 617-3203.

Sincerely,

Trisha Haucke

Trisha Haucke
Contracts Analyst
Bureau of Purchasing & Contracts
Division of Administrative Services

The Department of Highway Safety and Motor Vehicles is committed to Service, Integrity, Courtesy, Professionalism, Innovation and Excellence in all we do. Please let us know how we are doing via our online customer service survey at www.hsmv.state.fl.us.

Electra Theodorides-Bustle
Executive Director

2900 Apalachee Parkway
Tallahassee, Florida 32399-0500
www.flhsmv.gov

A SAFER
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HIGHWAY SAFETY AND MOTOR VEHICLES

Charlie Crist
Governor

Bill McCollum
Attorney General

Alex Sink
Chief Financial Officer

Charles H. Bronson
Commissioner of Agriculture

September 3, 2008

To: *Lt. Kelly Hildreth*

From: *Trisha Haucke, Contracts Analyst* T.H.

Subject: *FHP Policy 16.01*

Lt. Hildreth with regards to FHP policy 16.01, please review this policy and verify that FHP will continue to adhere to it. If this policy is still accurate please sign this memo so I can inform Mill Murray of Florida Power & Light.

If you have any questions I can be contacted at (850) 617-3203.

TMH

FHP Continues to use 16.01

Lt. Kelly M. H

Department of Energy

Oak Ridge Office
P.O. Box 2001
Oak Ridge, Tennessee 37831

September 3, 2008

Mr. Larry Hardin
Emergency Preparedness Manager
FPL Turkey Point Nuclear Plant
9760 SW 344 Street
Florida City, Florida 33035

Dear Mr. Hardin:

LETTER OF AGREEMENT - RADIATION EMERGENCY ASSISTANCE CENTER/TRAINING SITE (REAC/TS) SUPPORT

Please reference your electronic mail of August 28, 2008, requesting that the Department of Energy (DOE) REAC/TS facilities and team be available to provide back-up capability and assistance to the Turkey Point Nuclear Plant in the event of a radiological emergency. This response constitutes our agreement to provide this service upon your request.

We wish to remind you that our REAC/TS facilities in the Oak Ridge Institute for Science and Education (ORISE) are government controlled and operated by the Oak Ridge Associated Universities under contract with DOE. Therefore, REAC/TS is prohibited from competing with commercial firms, which can provide radiological emergency services. Only if the magnitude or uniqueness of a radiological emergency exceeds your in-house and commercially available capabilities would REAC/TS be authorized to provide back-up services.

Since these facilities are government controlled, no fee or retainer is required to assure the availability of back-up services by REAC/TS. However, if you utilize the services of REAC/TS, we should expect to recover those costs, which could reasonably be related to handling such an incident, including all charges billed to DOE or ORISE by hospitals and physicians. Information concerning the REAC/TS facilities, staff, services available, and procedures for seeking REAC/TS assistance can be obtained by direct contact with the REAC/TS Director, Dr. Albert Wiley, ORISE, Post Office Box 117, Oak Ridge, Tennessee 37831, or at telephone number (865) 576-3131.

Sincerely,

Gregory A. Mills

Gregory A. Mills
Contracting Officer's
Representative (Alt.)

cc:
A. L. Wiley, MS 39, ORISE
R. M. Kennard, MS 48, ORISE

National Nuclear Security Administration
Savannah River Site Office
P.O. Box A
Aiken, South Carolina 29802

September 11, 2008

Larry Hardin, Manager
Emergency Preparedness
Turkey Point Nuclear Plant
9760 SW 344 Street
Homestead, FL 33035

Dear Mr. Hardin:

Subject: Department of Energy (DOE)/ National Nuclear Security Administration (NNSA) Letter of Agreement for Emergency Support

Assurance is hereby given that DOE/NNSA will respond to requests for radiological assistance from licensees and Federal and State agencies involved in or cognizant of an incident believed to involve source, by-product, or other special nuclear material as defined by the Atomic Energy Act of 1954, as amended or other ionizing radiation sources. Assistance as indicated above would be made available to the Florida Power & Light Company with respect to incidents occurring at the Turkey Point Nuclear Plant upon request and in consonance with response activities conducted by State, local, and private industry emergency response personnel.

Unless DOE/NNSA or a DOE/NNSA contractor is responsible for the activity, ionizing radiation source, or radioactive material involved in the incident, DOE/NNSA radiological assistance will be limited to advice, detection and identification of radioactive materials, and/or monitoring and assessment actions essential for the control of the immediate hazards to health and safety. DOE/NNSA radiological assistance will be terminated when it is no longer needed or the necessary assistance is available from State, local, or commercial services. Therefore, responsibility for post-accident recovery, including further actions for the protection of individuals and the public health and safety, should be assumed by the appropriate government agency or private authority as soon as emergency conditions are stabilized.

Requests for DOE/NNSA radiological assistance may be directed to the Savannah River Site Operations Center at the 24-hour emergency assistance telephone number, (803) 725-3333. Questions regarding the DOE/NNSA Radiological Assistance Program may be directed to me at (803) 952-6613.

Sincerely,

Christina T. Edwards

Christina T. Edwards
Regional Response Coordinator
DOE Region 3

COR-SRSO-9/9/2008-39662

INPO®

Institute of Nuclear Power Operations

Suite 100
700 Galleria Parkway, SE
Atlanta, GA 30339-5943
770-644-8000
FAX 770-644-8549

September 30, 2008

Dear Ladies and Gentlemen:

This letter certifies that the plant emergency assistance agreement between INPO and its member utilities remains in effect. In the event of an emergency at your utility, INPO will assist you in acquiring the help of other organizations in the industry, as described in Section 1 of the Emergency Resources Manual, INPO 03-001. If requested, INPO will provide the following assistance:

- Facilitate technical information flow from the affected utility to the nuclear industry.
- Locate replacement equipment and personnel with technical expertise.
- Obtain technical information and industry experience regarding plant component and systems.
- Provide an INPO liaison to facilitate interface.

This agreement will remain in effect until terminated in writing. Should you have questions, please call Mark Lemke at (770) 644-8761 or e-mail lemkems@inpo.org.

Sincerely,

George Felgate
Vice President
Operations Division

GF:jkm

Sheriff

Monroe County Sheriff's Office
Richard D. Roth, Sheriff
5525 College Road
Key West, Florida 33040
(305) 292-7000 FAX: (305) 292-7070 1-800-273-COPS
www.keysso.net

SUBSTATIONS
Freeman Substation
20950 Overseas Hwy
Cudjoe Key, FL 33042
(305) 745-3184
FAX (305) 745-3761

Marathon Substation
3103 Overseas Hwy.
Marathon, FL 33050
(305) 289-2430
FAX (305) 289-2497

Islamorada Substation
87000 Overseas Hwy.
Islamorada, FL 33036
(305) 853-7021
FAX (305) 853-9372

Roth Building
50 High Point Road
Tavernier, FL 33070
(305) 853-3211
FAX (305) 853-4205

DETENTION CENTERS
Key West Det. Center
5501 College Road
Key West, FL 33040
(305) 293-7300
FAX (305) 293-7353

Marathon Det. Facility
4081 Ocean Terrace
Marathon, FL 33050
(305) 289-2420
FAX (305) 289-2424

Plantation Det. Facility
53 High Point Road
Plantation Key, FL 33070
(305) 853-3206
FAX (305) 853-4270

SPECIAL OPERATIONS
PO Box 500975
Marathon, FL 33050
(305) 289-2410
FAX (305) 289-2498

AVIATION DIVISION
10100 Overseas Hwy
Marathon, FL 33050
(305) 289-2777
FAX (305) 289-2776

COMMUNICATIONS
2796 Overseas Hwy
Marathon, FL 33050
(305) 289-2351
FAX (305) 289-2494

September 2, 2008

Mr. Larry Hardin, Emer. Prep. Mgr.
FPL Turkey Point Nuclear Plant
9760 SW 344 Street
Homestead, Florida 33035

Dear Mr. Murray:

In response to your recent phone call requesting valid verification of the agreement for emergency response at the Turkey Point Nuclear Plant; I am pleased to provide the following:

Personnel: 195 sworn Deputy Sheriffs and 53 Reserve Deputy Sheriffs
Facilities: The Sheriff's Office currently has operational facilities as listed:

a. Headquarters – Stock Island, Florida
b. Monroe County Detention Center, Stock Island, Florida
c. District I Substation-Cudjoe Key, Florida (21miles north of Key West, Fl.)
d. District II Substation- Marathon, Florida (40miles north of Key West, Florida)
e. Islamorada Substation – Islamorada, Florida (79 miles north of Key West, Fl.)
f. District III Substation - Plantation Key, Florida (85 miles north of Key West, Fl.)

Vehicles: The 195 sworn personnel have patrol units assigned on a full time basis.

Standard Equipment: All of the patrol units are equipped with standard emergency equipment, i.e. lights and sirens to facilitate emergency response.

Specialized Equipment: The Sheriff's Office maintains a SWAT team with a total of nine officers and a Bomb Disposal Unit, all of which are appropriately equipped. Between all of the Substations, we have six patrol PWC's equipped for police use.

Communications Equipment: All vehicles listed above are equipped with two-way, hand-held, radio equipment that is supported by a wide-area ASTRO Digital SmartZone Dual Mode Trunked 800 MHZ, 26 Frequency, Communications System that includes Statewide Mutual Aide talk groups.

The duties that this Agency can perform in the event of an emergency would include the rendering of first-aid, control of traffic and general law enforcement requirements. The Sheriff's jurisdiction is generally confined to Monroe County, Florida unless it is extended by the invitation of the Metro-Dade Public Safety Department, or other appropriate law enforcement agency.

In the event that such emergency should arise, we will respond to the limits of our available manpower and equipment while continuing to provide necessary law enforcement services to the community. If the information contained in this letter is insufficient or needs clarification, please feel free to contact me at your earliest convenience.

Very truly yours,

Richard D. Roth

Sheriff Richard D. Roth

RAR/vam
c/documents2/hurricane

Miami-Dade Fire Rescue Department
Office of the Fire Chief
9300 N.W. 41st Street
Doral, Florida 33178-2414
T 786-331-5000 F 786-331-5101

miamidade.gov

September 5, 2008

Mr. R.D. Mothena
Turkey Point Nuclear Plant
Florida Power & Light Company
Emergency Preparedness Department
9760 SW 344th Street
Florida City, FL 33035

Dear Mr. Mothena:

This letter confirms the Miami Dade Fire Rescue Department's continued support in the event of an emergency situation at your facility. Please be advised that our normal emergency response plan remains unchanged.

Upon notification through emergency operators (911) of an incident at Florida Power & Light's (FPL) Turkey Point Plant, the Miami Dade Fire Rescue Department (MDFRD) will respond with a dispatch of fire and rescue units. A typical assignment will include:

1. Six Suppression Vehicles
   a. one aerial
   b. one ladder
   c. four pumpers
2. Two Rescue Vehicles
3. Two Supervisory Units
4. The normal complement of personnel assigned to these units is 32.
5. A Hazardous Materials Unit will be dispatched that specializes in incidences involving hazardous materials, and is equipped with sophisticated information systems and equipment.

If conditions warrant, additional units would be dispatched, including support units. Fire Department emergency services include:

1. Fire Suppression
2. Basic and advanced life support and related assistance

MDFRD response strategies for large area fires would include the following type of support:

1. Near or onsite staging areas for pre-positioning of equipment and materials.
2. Support from airlift resources as necessary and available for fire fighting (personnel and equipment transport only).
3. Incident command and control function with technical assistance.
4. For large accelerant fire support, the dispatch of the following types of equipment, if required, could include:

    a. A foam trailer from Miami International Airport (MIA) capable of holding 1000 gallons of 3% aqueous film-forming foam (AFFF) concentrate, and containing a permanently-mounted monitor nozzle for foam application.
    b. Transportable extinguishing systems such as the MIA crash (foam) truck capable of generating a high-volume solution of AFFF.
    c. Fire apparatus pumpers that will meet a combined flow demand requirement in excess of 2000 gpm.
    d. High volume monitor nozzles (supplied from ground monitors, apparatus monitors, and ladder pipe monitors, all with associated hoses and nozzles) capable of a combined flow of 1000 to 6000 gpm.
    e. Portable ventilation equipment.
    f. Communication equipment as necessary for activation of mutual aid fire fighting teams.
    g. SCBA equipment with refill capability.
    h. Portable emergency lighting.
    i. Personnel protective equipment with reflective capability.

5. Provisions for treatment of multiple casualties up to and including advanced life support air transport.

During an emergency, MDFRD is able to provide high volume (>200 gpm) monitor nozzles and associated equipment to be supplied from ground monitor and/or ladder apparatus. Under most anticipated conditions, this will occur within 1 hour. Should it become necessary, MDFRD will be able to provide assistance for cooling the Spent Fuel Pool during an emergency incident. This will occur in accordance with the EPA protective action guidelines for emergency workers, by using fire rescue equipment to spray any safely accessible opening of the structure. Subject to available resources, MDFRD will also be able to assist in minor mitigation involving a Spent Fuel Pool release by spraying water from a remote location.

Personnel and equipment are obligated to implement provisions of the Turkey Point Radiological Emergency Plan to the extent of available resources. The Radiological Emergency Plan places the Turkey Point Emergency Coordinator responsible for overall site response to any emergency, including large-scale fires and explosions. Incident Command authority for response to a fire emergency at Turkey Point, including search and rescue, fire suppression, and property conservation is as follows:

- Inside the Security Protected Area, the Fire Brigade Leader has command and control authority for a fire emergency, with MDFRD providing mutual aid support. Onsite radiation protection personnel would support response effort.

- Outside the Security Protected Area, the chief Officer from MDFRD has command and control authority for a fire emergency, with the Turkey Point Fire Brigade Leader acting in a support capacity providing technical liaison and coordination with the Emergency Coordinator.

Both MDFRD and Turkey Point recognize the use of the National Incident Management System (NIMS) and support the use of the "Unified command" concept should a large-scale fire emergency occur.

If any further information is necessary, please contact Assistant Fire Chief Cynthia Sears at 786-331-5104, or electronic mail searsc@miamidade.gov. Please copy her assistant, Ms. Dulce Williams, on any correspondence sent electronically at e-mail address dulce.williams@miamidade.gov.

Sincerely,

Herminio Lorenzo, Director
Miami-Dade Fire Rescue

HL/CSS/dw

c: Cynthia S. Sears, Assistant Fire Chief
For Operatons

MERCY Hospital

December 4th, 2008

Larry Hardin
Emergency Preparedness Manager
FPL Turkey Point Nuclear Plant
9760 SW 344 Street
Florida City, Florida 33035

Dear Mr. Hardin:

The following is the information stating our support, capabilities and resources available to you in the event of an emergency at one of your nuclear plants.

1. Administrative point of contact:

   John Marshall, M.D., E.D. Medical Director
   Mercy Hospital Emergency Department
   3663 South Miami Avenue
   Miami, Florida 33133
   Business Hours: Office (305) 284-2174
   24 hour-seven days a week (561) 289-8720

2. Scope of Services:
   A) Physicians and Mercy Hospital shall perform radiological emergency medical services ("Services") for FPL's Turkey Nuclear Plant for the diagnosis and treatment of injury accompanied by radiological contamination, or actual or alleged injury due to radiation exposure.

   B) Physicians and Mercy Hospital shall maintain a twenty-four hour per day roster of qualified physicians who shall be on call and available in the event of an emergency.

   C) Physicians and Mercy Hospital shall provide emergency treatment and services without delay at the facility on a twenty-four hour per day, seven day per week basis, for FPL employees and any other person designated by FLP who may have been involved in radiation incident.

We will continue to cooperate in every way possible in the radiological emergency preparedness program. If there is anything further you require or if we can be of any assistance in any way, please do not hesitate to contact us.

Sincerely,

John Johnson
President & Chief Executive Officer
Mercy Hospital

John Marshall, M.D.
E.D. Medical Director
Mercy Hospital

FPL

Inter-Office Correspondence

To: Emergency Preparedness

From: Nick Eggemeyer

Date: October 16, 2008

Subject: **Turkey Point Security Integrated Response Plan**

This memo is intended to present a description of the interface agreements that are in place between the Turkey Point Security Department and numerous key Law Enforcement Agencies.

In addition to the Letter of Agreement with Miami-Dade Police Department, the Turkey Point Security Department maintains a Security Force Instruction (SFI-2405) which enhances existing agreements with key Law Enforcement Agencies that are likely to respond to a security contingency event at the Turkey Point Nuclear Plant. This instruction does not supersede any Nuclear Regulatory Commission approved documents related to the Turkey Point Nuclear Plant, but is intended to enhance these documents as they relate to a contingency response. This enhancement includes guidance in Command and Control, Communications, and Logistics.

This instruction (SFI-2405) has been reviewed and concurred with by the following agencies:

Miami-Dade Police Department
Federal Bureau of Investigation
United States Customs
United States Coast Guard
Florida Department of Law Enforcement
Homestead Police Department

Nick Eggemeyer
PTN Security Manager

U.S. Department of Homeland Security
United States Coast Guard

Commander
Seventh Coast Guard District

909 SE First Ave
Miami, FL 33131
Staff Symbol: dxc
Phone: (305) 415-7156
Fax: (305) 415-6848
Email: Kenneth.C.Jones@uscg.mil

3010
September 29, 2008

Emergency Preparedness Manager
Turkey Point Nuclear Plant
9760 SW 344 Street.
Florida City, FL 33035
Attn: Larry Hardin

Dear Sir,

The following information is provided in response to your email request on August 28, 2008, in which you requested the United States Coast Guard provide a new letter of support indicating our ability to meet the requirements of your Radiological Emergency Plan. This letter provides current resource and support capabilities for Coast Guard assets located in the vicinity of the Florida City Turkey Point Nuclear Plant. Please note that any emergency assistance that the Coast Guard may provide would be limited by the fact that Coast Guard crews are not equipped or trained for radiological response, and thus, cannot be exposed to radiological contamination. Coast Guard assets will be restricted to activities and geographic locations that are air monitored for radioactive fallout and are certified to be safe without protective clothing or equipment. Consequently, the Coast Guard is unable to act as the primary responder for nuclear power plant disasters.

As requested in your letter, the following information is provided.

1. Administrative point of contact.

   (a) The Seventh Coast Guard District's Contingency Preparedness Officer and administrative point of contact for this issue is Lieutenant Ken Jones. LT Ken Jones' phone number is (305) 415-7156 and email address is Kenneth.C.Jones@uscg.mil.

   (b) Operational response point of contact. Coast Guard Sector Miami, in their capacity as Federal Maritime Security Coordinator for your region, is the First Responder for incidents at your facility. Sector Miami's operational response point of contact for this issue is CDR Randall Nelson at (305) 535-4302.

2. Description of resources and support that can be provided.

   (a) Maritime: The nearest Coast Guard facility to Turkey Point Nuclear Plant is Coast Guard Station Miami Beach. Station Miami Beach has two 41 foot Utility Boat-Big (UTB) with a capability of carrying 23 people max (20 excluding crew), two Special Purpose Craft - Law Enforcement (SPC/LE) with a capability of carrying 18 people max (15 excluding crew), and three Response Boat - Small with a capability of carrying 10 people max (7 excluding crew). All of these vessels may not be available for response at

any given time due to current operations, staffing or maintenance.

(b) Provided that the Station resources are not engaged in a life threatening emergency or some other operational commitment, the normal vessel response time to the vicinity of the Turkey Point Nuclear Plant is 40 to 70 minutes after notification and depending on the boat deployed. These maritime assets can also enforce Coast Guard imposed safety and security zones to prevent waterside entry into radiological contaminated areas, and to transport response personnel, equipment, and injured personnel.

(c) Air: The nearest Coast Guard Air Station to the Turkey Point Nuclear Plant is Air Station Miami. Air Station Miami maintains HH-65 Rescue helicopters that are capable of carrying 2-3 people and of remaining on scene for 90 minutes without refueling. The normal response time for helicopters based at Coast Guard Air Station Miami to Turkey Point is approximately 40 minutes after notification. Provided that the area has been certified as safe, and upon official request, these helicopters are available for transportation of personnel and material to assist in the disaster response, as well as for medical evacuation of injured personnel. Additional information about these assets can be found at http://www.uscg.mil/datasheet/.

(d) Security Support: The Coast Guard Captain of the Port of Miami, located at Sector Miami, may establish a safety or security zone preventing vessel movement into the U.S. navigable waters affected by a disaster. Power plant facility officials must contact Commander, Coast Guard Sector Miami to have a safety or security zone established. A request for a safety or security zone may be made through the Sector Miami Command Center as outlined in paragraph 3 below. Coast Guard vessels may be available to physically prevent vessel entry into contaminated waters, as stipulated in subparagraph 4 (c). However, safety or security zone implementation may only be available by radio broadcast if air monitoring is not available or if the effects and movement of fallout cannot be adequately predicted.

3. Process/procedure to be used to obtain this support and method for information exchange.

Should you need our support, either in the form of asset support or the establishment of a safety or security zone, your initial point of contact is the Sector Miami Command Center in Miami Beach, Florida. The Command Center can be reached at (305) 535-4472. If for any reason you are unable to contact them in the event of an emergency, you should contact the Coast Guard Seventh District Command Center in Miami, Florida. The Seventh District Command Center can be reached at (305) 415-6800. Both Command Centers are staffed 24 hours a day year round.

4. Description of the authorities, responsibilities, and limits on Coast Guard actions.

(a) Under Title 14 U.S. Code Section 88, the Coast Guard has the authority to render aid to distressed persons, vessels, and aircraft on the high seas and in the navigable waters of the United States. This includes the authority to perform any acts necessary to rescue and aid persons and protect and save property.

(b) Under 14 U.S. Code Section 89, the Coast Guard may enforce all Federal laws on vessels and waters over which the United States has jurisdiction. Further, under 14 U.S. Code Section 141, when so requested by proper authority, the Coast Guard may utilize its personnel and facilities to assist federal, state, and local government authorities to perform any activity for which Coast Guard personnel and facilities are especially qualified. Among other things, this may include transportation of personnel and material to assist in disasters or response to other emergency situations.

(c) Under the Ports and Waterways Safety Act, 33 U.S. Code Section 1221, 33 CFR 165, the Magnuson Act, 50 U.S. Code Section 191, and the Coast Guard's regulatory authority under 33 CFR 6, the Coast Guard has the authority to implement and enforce safety and security zones.

(d) Any emergency assistance that the Coast Guard may provide would be limited by the fact that Coast Guard crews are not equipped or trained for radiological response, and thus, cannot be exposed to radiological contamination. Coast Guard assets will be restricted to activities and geographic locations that are air monitored for radioactive fallout and are certified to be safe without protective clothing or equipment.

5. Any other information pertinent to your organization's emergency response capabilities.

The Coast Guard Deployable Operation Group (DOG) provides specialized force packages which can be obtained utilizing the same requesting procedures mentioned in paragraph 3. The DOG's specialized emergency response units are the National Strike Force (NSF) and Maritime Safety and Security Team (MSST). The NSF is capable of providing highly specialized personnel and equipment to facilitate preparedness and response to oil and hazardous substance pollution incidents in order to protect public health and the environment. The MSST has rapid response elements (waterborne and landside) to provide waterside security and landside force protection, safety and security zones, entry control points, canine, divers, and underwater remote vehicle.

6. Should you desire specific details of Coast Guard capabilities please contact Lieutenant Ken Jones (phone and email in paragraph 1.a.).

Sincerely,

LISA R. TAMBLINGSON
Captain, U.S. Coast Guard
Chief, Planning and Force Readiness Division
Seventh Coast Guard District
By direction of the District Commander

3010
September 29, 2008

Copy: Federal Emergency Management Agency Region IV
State of Florida Department of Community Affairs
Miami-Dade County Public Safety Office
Commander, Seventh Coast Guard District (drm), (dp), (dx), (dl)
Commanding Officer, Coast Guard Air Station Miami
Commander, Coast Guard Sector Miami
Commanding Officer, Station Miami Beach
Coast Guard Deployable Operations Group
Marine Safety and Security Team 91114

SSD.

Miami-Dade Police Department

Director's Office

An Internationally Accredited Police Service

We Care | We Protect | We Serve

September 20, 2008

Mr. Larry Hardin, Emergency Preparedness Manager
FPL Turkey Point Nuclear Plant
9760 SW 344 Street
Florida City, Florida 33035

Dear Mr. Hardin:

Thank you for your recent correspondence requesting that the Miami-Dade Police Department (MDPD) confirm its continued support of police services to any emergency incidents at the Turkey Point Nuclear Power Plant.

The MDPD will continue to respond to all incidents at the power plant with the manpower and resources needed to adequately support your personnel. Additionally, our Homeland Security and Special Patrol Bureaus participate in a variety of training exercises to specifically deal with incidents and events at your facility.

Please feel free to contact Major Michael Ronczkowski, of the Homeland Security Bureau, at (305) 470-3900, if we can be of further assistance.

Sincerely,

Robert Parker
Director

c: G. Terp, Major
Special Patrol Bureau

C. Garcia, Major
Cutler Ridge District

RECEIVED
DIRECTOR'S OFFICE
2008 SEP 15 PM 1:28

Orig mailed
C's to Terp
Garcia
memo
SSD
9/15/08

9105 NW 25 Street • Miami, Florida • 33172-1500
Telephone (305) 471-2100 • Fax (305) 471-2163 • Website http://www.mdpd.com

Supplemental Information 5

NUREG-0654 Section II, Evaluation Criteria Cross-Reference to Florida Radiological Emergency Management Plan (REMP) & Appendix II, Turkey Point Nuclear Site

Florida Radiological Emergency Management Plan (REMP) & Appendix II
Turkey Point Nuclear Plant Site Plan
Review/Cross-Reference to NUREG-0654, Section II, Evaluation Criteria

Note: The State Comprehensive Emergency Management Plan has been cross-referenced in some sections as appropriate.

NUREG-0654 CRITERIA	State of Florida Radiological Emergency Management Plan (REMP)	Miami-Dade County	Monroe County
A. ASSIGNMENT OF RESPONSIBILITY			
1. a. Response Organizations	Chapter 2, Sections II-VII	Section II.A	Section II.B
b. Concept of Operations	Chapter 2, Sections II-VII Chapter 3, Section II	Section II.A	Section II.B
c. Organizational Charts	Chapter 2, Figures 2-1 and 2-2	Figure II-4	Figure II-6
d. Emergency Response Direction & Control	Chapter 2, Section I Chapter 3, Section II	Section II.A.1 & II.A.2 Section III.A	Section II.B.1 & II.B.2 Section III.B
e. 24-hour Response	Chapter 2, Section 1 Chapter 5, Section I Chapter 6, Sections II & III Chapter 9, Section III.B	Section II (Pg. II-1) Section II.A.1	Section II (Pg.II-1) Section II.B.1
2. a. Primary & Support Responsibilities	Chapter 2, Sections I & II; Figure 2-2	Section II.A & Figure II-3	Section II.B & Figure II-5
b. Legal Basis for Authorities	Chapter 2, Section I	Section II (Pg. II-1)	Section II (Pg. II-1)
3. Written Agreements	CEMP, Section 1	CEMP, Section 1	CEMP, Section 1
4. Principal organization -- continuous operations and responsibility	Chapter 2, Section I Chapter 6, Sections II & III	Section II (Pg. II-1) Section II.A.1	Section II (Pg. II-1) Section II.B.1
B. ONSITE EMERGENCY ORGANIZATION	N/A N/A		N/A

NUREG-0654 CRITERIA	State of Florida Radiological Emergency Management Plan (REMP)	Miami-Dade County	Monroe County
C. EMERGENCY RESPONSE SUPPORT AND RESOURCES			
1. a. Authorization to Request Federal Assistance	Chapter 9, Section IV.A & B	N/A	N/A
b. Federal Resources Expected	Chapter 9, Section IV.B	N/A N/A	
c. Support for Federal Response	Chapter 8, Section II.C	Section IX.G	Section IX.G
2. a. Representative to EOF	Chapter 5, Sections II.B & II.C Chapter 8, Section II.C & III	Section IX.C	Section IX.C
b. Utility Dispatch EOC Reps	N/A	N/A	N/A
3. Radiological Laboratories and Analyses Services	Chapter 8, Section V & Figure 8-1 Chapter 9, Sections III & IV	NA N/A	
4. Support Facilities and Org.	Chapter 9, Sections III & IV Chapter 12, Sections I & II; Figures 12-1 & 12-2	Section II Section IX.G Section XIII	Section II Section IX.G Section XIII

NUREG-0654 CRITERIA	State of Florida Radiological Emergency Management Plan (REMP)	Miami-Dade County	Monroe County
D. EMERGENCY CLASSIFICATION SYSTEM			
1. Licensee establishment of Emergency Classification & Emergency Action Level (EAL) Scheme	NA N/A		N/A
2. Initiating Conditions include example conditions in App. 1	N/A N/A		N/A
3. State/Local establishment of Emergency Classification and EAL Scheme	Chapter 4, Sections II & III	Section IV & REMP	Section IV & REMP
4. State/Local Procedures for Emergency Actions	Chapter 4, Section III Figure 4-1 Chapter 4, Sections I & II	Section V	Section V
E. NOTIFICATION METHODS & PROCEDURES			
1. Notification of Response Organizations and Message Verification	Chapter 5, Sections I & II	Section V	Section V
2. Alerting, Notifying, and Mobilizing Response Personnel	Chapter 5, Sections I & II	Section V, A through D	Section V, A through D
3. Contents of Initial Emergency Messages	Chapter 5, Section I & Figure 5-1	N/A	N/A
4. Follow-up Message Content	Chapter 5, Section I & Figure 5-1	N/A	N/A
5. Dissemination of Emergency Information to the Broadcast Media (EAS)	Chapter 5, Section III Chapter 7, Section VII	Section VI	Section VI

NUREG-0654 CRITERIA	State of Florida Radiological Emergency Management Plan (REMP)	Miami-Dade County	Monroe County
6. Public Warning and Notification in Plume Exposure Pathway EPZ	Chapter 5, Section III Chapter 7, Section VII	Section VI	Section VI
7. Draft Messages for Protective Actions for the Public	Chapter 7, Figures 7-1 through 7-8	Section VI	Section VI
F. EMERGENCY COMMUNICATIONS			
1a. 24-hour Primary and Back-up Notification and Activation of State/Local Response Network	Chapter 5, Section I Chapter 6, Section II	Section VII.A	Section VII.B
b. With Contiguous State/Local Governments in 10-Mile EPZ	Chapter 6, Section III	Section VII.A	Section VII.B
c. With Federal Response Organizations	Chapter 6, Section III.B	Section VII.A	Section VII.B
d. Between the Plant EOF and State/local EOC's and Radiological Monitoring Teams	Chapter 6, Section III.A, D, & F	Section VII.A	Section VII.B

NUREG-0654 CRITERIA	State of Florida Radiological Emergency Management Plan (REMP)	Miami-Dade County	Monroe County
F. EMERGENCY COMMUNICATIONS (Cont.)			
e. Alerting and Activating Emergency Response Personnel	Chapter 6, Sections II and III	Section VII.A	Section VII.B
f. Between Licensee and NRC	N/A	N/A	N/A
2. Communication Link for Medical Support Facilities	Chapter 6, Section III. B & C	Section VII.A	Section VII.B
3. Periodic Testing of Emergency Communications System	Chapter 6, Section IV Figure 6-1	Section VII.C	Section VII.C

NUREG 0654 CRITERIA	State of Florida Radiological Emergency Management Plan (REMP)	Miami-Dade County	Monroe County
G. PUBLIC EDUCATION & INFORMATION			
1. Dissemination of Annual Public Information on Emergency Notification & Actions	Chapter 7, Section VII	Section VIII.A	Section VIII.A
2. Public Information Program for Permanent & Transient Population	Chapter 7, Section VII	Section VIII.A	Section VIII.A
3.a. Media Points of Contact & Locations	Chapter 7, Section II, III, & IV. B	Section IX.D	Section IX.D
b. Space for News Media	Chapter 7, Section IV	N/A	N/A
4.a. Designated Organization Spokesperson	Chapter 7, Section II	Section VIII.C & IX.D	Section VIII.C & IX.D
b. Coordination among Spokespersons	Chapter 7, Section V	Section VIII.C	Section VIII.C
c. Rumor Control	Chapter 7, Section VI	Section VIII.D	Section VIII.D
5. Annual Program to Acquaint News Media	Chapter 7, Section VII	Section VIII.B	Section VIII.B
H. EMERGENCY FACILITIES AND EQUIPMENT			
1. Licensee TSC	N/A	N/A N/A	
2. Licensee EOF	N/A	N/A	N/A

NUREG 0654 CRITERIA	State of Florida Radiological Emergency Management Plan (REMP)	Miami-Dade County	Monroe County
3. EOC for Response Direction & Control	Chapter 8, Section II. A & B	Section IX.A Figure II-7	Section IX.B Figure II-8
4. Activation and Staffing of Facilities and EOC's	Chapter 8, Section II.A	Section V (A through D) Section IX.A	Section V (A through D) Section IX.B
5. Onsite Monitoring Systems	N/A	N/A	N/A
6. Data Access to Offsite Monitoring/Analysis Equipment	N/A N/A		N/A
7. Offsite Radiological Monitoring Equipment	Chapter 8, Section V.B Figure 8-2	Section IX.F & Figure II-12	Section IX.F & Figure II-12
8. Meteorological Instrumentation	N/A N/A		N/A
9. Licensee OSC	N/A	N/A	N/A
10. Emergency Equipment Insp.Inventory, and Op. Check	Chapter 8, Section V.B	Section IX.F.1	Section IX.F.2
11. Emergency Kits	Chapter 8, Figures 8-1 through 8-4	Section IX.F.1 & Figure II-12	Section IX.F.1 & Figure II-12
12. Central Point for Receipt/Analysis of Field Monitoring Data	Chapter 8, Section V.A Figure 8-1	Section X	Section X

NUREG 0654 CRITERIA	State of Florida Radiological Emergency Management Plan (REMP)	Miami-Dade County	Monroe County
I. ACCIDENT ASSESSMENT			
1. Plant System and Effluent Parameters	N/A	N/A	N/A
2. Post-Accident Sampling Capability	N/A	N/A	N/A
3. Methods/techniques for Determining Source Term	N/A	N/A	N/A
4. Effluent Monitor Readings and Onsite/Offsite Exposures, Contamination	N/A	N/A N/A	
5. Acquire/Evaluate Met Data iaw Appendix 2	N/A	N/A	N/A
6. Determine Release Rates/Doses if Instrumentation Offscale	N/A	N/A N/A	
7. Field Monitoring Capability and Resources within 10-Mile EPZ	Chapter 8, Figures 8.2 through 8.4 Chapter 9, Section III	Section X	Section X
8. Radiological Hazard Assessment Capability	Chapter 9, Sections III & IV Chapter 11, Section III.C	Section X	Section X
9. Detection and Measurement of Airborne Radioiodine	Chapter 9, Section III.A	N/A	N/A
10. Relating Measured Parameters and Gross Radioactivity Measurements; Dose Estimation and Comparison with PAG's	Chapter 9, Section III.A Department of Health Operating Procedures	N/A	N/A
11.Arrangements to Locate/Track Airborne Radioactive Plume	Chapter 9, Section III.A	N/A	N/A

NUREG 0654 CRITERIA	State of Florida Radiological Emergency Management Plan (REMP)	Miami-Dade County	Monroe County
J. PROTECTIVE RESPONSE			
1. Means/Time Required to Warn Onsite Individuals	N/A N/A		N/A
2. Evacuation Routes and Transportation Provisions	Chapter 11, Section V	Section XII.E	Section XII.E
3. Radiological Monitoring of Site Evacuees	N/A N/A		N/A
4. Onsite Evacuation at Site Area or General Emergency	N/A N/A		N/A
5. Accountability of Individuals Onsite	N/A N/A		N/A
6. Licensee Provisions for Onsite Respiratory prot.; Prot. Clothing; Radioprotective drugs	N/A N/A		N/A
7. Method for Recommending Protective Actions to State/Locals	N/A N/A		N/A
8. Licensee Evacuation Time Estimates iaw App. 4	N/A N/A		N/A
9. Criteria and PAGs for Protective Actions	Chapter 11, Section IV Figures 11-1, 11-2, & 11-3	Section XII.A	Section XII.A
10.a. Map showing Evacuation Zones & Routes ; Evac. Time Estimate; Sampling and Monitoring Pts; and Shelter Locations	Chapter 11, Section V	Figure II-9 Figure II-10 Figure II-15 Figure II-16	Figure II-11 Figure II-15 Figure II-16
b. Population Density Map	Chapter 11, Section V	Figure II-14	Figure II-14
c. Notification of All Population Segments	Chapter 5, Section III Chapter 7, Section VII	Section VI	Section VI
d. Protection for Immobile Persons	Chapter 11, Sections V & VII Chapter 10, Section IV	Section XII.E.2	Section XII.E.2
e. Provisions for use of Radioprotective Drugs	Chapter 10, Section IV Chapter 11, Section VII	Section XII.B	Section XII.B

J. PROTECTIVE RESPONSE (CONTINUED)			
f. Administration of Radioprotective Drugs to Emergency Workers	Chapter 10, Section IV Chapter 11, Section VII	Section XI Section XII.B	Section XI Section XII.B
g. Means of Relocation	Chapter 11, Section III.C	Section XII.E	Section XII.E
h. Relocation Centers (Shelters)	Chapter 11, Section V	Section IX.G Figure II-9	Section IX.G Figure II-11
i. Traffic Capacities of Evacuation Routes	Chapter 11, Section V	Figure II-16	Figure II-16
j. Control of Access to Evacuated Areas	Chapter 2, Section II.C Figure 2-2 Chapter 11, Section III.B.2	Section XII.C & E Figure II-3	Section XII.C & E Figure II-5
k. Potential Impediments to Use of Evacuation Zones	Chapter 11, Section V	Addressed in State REMP	Addressed in State REMP
l. Evacuation Time Estimates	Chapter 11, Section V	Figure II-16	Figure II-16
m. Bases for the Choice of Protective Actions	Chapter 11, Section III.A	N/A	N/A
11. Protective Measures for the Ingestion Pathway	Chapter 11, Section II.B Figure 11-3	N/A N/A	
12. Registering and Monitoring Evacuees	Chapter 11, Section III.B	Section XII. F & G	Section XII. F & G

NUREG 0654 CRITERIA	State of Florida Radiological Emergency Management Plan (REMP)	Miami-Dade County	Monroe County
K. RADIOLOGICAL EXPOSURE CONTROL			
1. Onsite Exposure Guidelines	N/A	N/A	N/A
2. Onsite Radiation Protection Program	N/A N/A		N/A
3. a. Doses Received by Emergency Personnel & Distribution of Dosimeters	Chapter 10, Section II	Section XI	Section XI
b. Dosimeter Reading and Records for Emergency Workers	Chapter 10, Section II Figures 10-1 & 10-2	Section XI	Section XI
4. Decision to Authorize Exposure in Excess of PAG's for Emergency Workers	Chapter 10, Section III Chapter 11, Section IV Figure 10-3	Section II.A.1 Section XI	Section II.B.1 Section XI
5. a. Action Levels for Determining the Need for Decontamination	Chapter 10, Section V Figure 10-2	Section XII.F Action levels are described in the REMP.	Section XII.F Note: Action levels are described in the REMP.
b. Means for Decontamination	Chapter 10, Section V Chapter 11, Section ?	Section XII.F	Section XII.F
6. Onsite Contamination Control	N/A	N/A	N/A
7. Decontamination of Relocated Onsite Personnel	N/A N/A		N/A
L. MEDICAL AND PUBLIC HEALTH SUPPORT			
1. Hospital and Medical Services to Evaluate and Treat Radiation Exposure	Chapter 12, Sections I, II & III Figures 12-1 & 12-2	Section XIII	Section XIII
2. Onsite First Aid Capability	N/A	N/A	N/A
3. Public, Private, and Military Medical Support	Chapter 12, Section II.A Figures 12-1 & 12-2	N/A N/A	
4. Transporting Victims to Medical Facilities	Chapter 12, Section III Figure 12-2	Section II.A.9	Section II.B. 7

M. RECOVERY AND REENTRY PLANNING AND POST-ACCIDENT OPERATIONS	State of Florida Radiological Emergency Management Plan (REMP)	Miami-Dade County	Monroe County
1. Plans and Procedures (re-entry into evacuate area)	Chapter 11, Section III Chapter 13, Sections I – III Figure 13-1	Section XIV & State REMP	Section XIV & State REMP
2. Key Positions in Licensee Recovery Organization	N/A N/A		N/A
3. Notification of Initiation of Recovery Operation	Chapter 13, Section II	N/A	N/A
4. Method of Periodically Estimating Total Population Exposure	Chapter 13, Section IV	N/A	N/A
N. EXERCISES AND DRILLS			
1.a. Exercises that Require Response of Offsite Authorities	Chapter 14, Section II	Section XV & State REMP	Section XV & REMP
b. Exercise Scenario and Critique	Chapter 14, Section II.F & G	Section XV & State REMP	Section XV & State REMP
2. a. Communication Drills	Chapter 14, Section III.A	Section XV & State REMP	Section XV & State REMP
b. Fire Drills	N/A	N/A	N/A
c. Medical Emergency Drills	NA for State; however addressed in Chapter 14, Section III.B	Section XV & State REMP	Section XV & State REMP
d. Radiological Monitoring Drills	Chapter 14, Section III.C	Section XV & State REMP	Section XV & State REMP
e. Health Physics Drills 1) Response to Simulated, Elevated Airborne/Liquid Samples	Chapter 14, Section III.D	N/A	N/A

N. EXERCISES AND DRILLS (CONT.)	State of Florida Radiological Emergency Management Plan (REMP)	Miami-Dade County	Monroe County
2) Analysis of Inplant Samples	N/A	N/A	N/A
3. a. Objectives and Evaluation Criteria	Chapter 14, Section II.F.2	Section XV & State REMP	Section XV & State REMP
b. Dates, Time Periods and Participating Organizations	Chapter 14, Section II.F.2	Section XV & State REMP	Section XV & State REMP
c. Simulated Events	Chapter 14, Section II.F.2	Section XV & State REMP	Section XV & State REMP
d. Time Schedule of Real and Simulated Initiating Events	Chapter 14, Section II.F.2	Section XV & State REMP	Section XV & State REMP
e. Narrative Summary	Chapter 14, Section II.F.2	Section XV & State REMP	Section XV & State REMP
f. Arrangements and Advance Material for Observers	Chapter 14, Section II.F.2	Section XV & State REMP	Section XV & State REMP
4. Federal, State, and Local Critique and Evaluation	Chapter 14, Section II.G	Section XV & State REMP	Section XV & State REMP

NUREG 0654 CRITERIA	State of Florida Radiological Emergency Management Plan (REMP)	Miami-Dade County	Monroe County
5. Evaluation Criteria for Plan, Procedural Changes/ Assignment of Corrective Actions	Chapter 14, Section II.G	Section XV & State REMP	Section XV & State REMP
O. RADIOLOGICAL EMERGENCY RESPONSE TRAINING			
1. Organization Training of Appropriate Individuals	Chapter 15, Section II	Section XVI & State REMP	Section XVI &State REMP
a. Site-specific Training for Offsite Responders	N/A N/A		N/A
b. Offsite Response Training	Chapter 15, Sections II - IV	Section XVI & State REMP	Section XVI & State REMP
2. Onsite ERO Training	N/A	N/A	N/A
3. Licensee First Aid Team Training	N/A N/A		N/A
4. Training Program Establishment	Chapter 15, Section I - V	Section XVI & State REMP	Section XVI & State REMP
a. Directors/coordinators of Response	Chapter 15, Section II.C Figures 15-1 through 15-3	Section XVI & State REMP	Section XVI & State REMP

NUREG 0654 CRITERIA	State of Florida Radiological Emergency Management Plan (REMP)	Miami-Dade County	Monroe County
O. RADIOLOGICAL EMERGENCY RESPONSE TRAINING (CONT.)			
b. Accident Assessment Personnel	Chapter 15, Figures 15-1 through 15-3	Section XVI & State REMP	Section XVI & State REMP
c. Radiological monitoring team/analysis personnel	Chapter 15, Figures 15-1 through 15-3	Section XVI & State REMP	Section XVI & State REMP
d. Police/security/fire-fighting personnel	Chapter 15, Figures 15-1 through 15-3	Section XVI & State REMP	Section XVI & State REMP
e. Repair/damage Cont. Personnel.	N/A N/A		N/A
f. First aid/rescue personnel	Chapter 15, Figures 15-1 through 15-3	Section XVI & State REMP	Section XVI & State REMP
g. Local support services personnel (civil defense, emergency service)	Chapter 15, Figures 15-1 through 15-3	Section XVI & State REMP	Section XVI & State REMP
h. Medical support personnel	Chapter 15, Figures 15-1 through 15-3	Section XVI & State REMP	Section XVI & State REMP
i. Licensee headquarters support personnel	N/A N/A		N/A
j. Personnel responsible for Transmission of Emergency Information	Chapter 15, Figures 15-1 through 15-3	Section XVI & State REMP	Section XVI & State REMP
5. Initial Training and Retraining	Chapter 15, Sections III & V	Section XVI & State REMP	Section XVI & State REMP

* Locals who have accident assessment capability are encouraged to include in training programs.

NUREG 0654 CRITERIA	State of Florida Radiological Emergency Management Plan (REMP)	Miami-Dade County	Monroe County
P. RESPONSIBILITY FOR THE PLANNING EFFORT			
1. Training for Planners	Chapter 15, Section III	Section XVI & State REMP	Section XVI & State REMP
2. Authority and Responsibility for Planning	State Comprehensive Emergency Management Plan (SCEMP): Section IV.C.2	Section II	Section II
3. Emergency Planning Coordinator	State Comprehensive Emergency Management Plan (SCEMP): Section IV.C.2	Section II.A.2	Section II.B.2
4. Plan and Agreement Review and Update	State Comprehensive Emergency Management Plan (SCEMP): Section IV.C.2	Section II.A.2	Section II.B.2
5. Distribution of Plans and Approved Revisions	State Comprehensive Emergency Management Plan (SCEMP): Section IV.C.2	Section II.A.2	Section II.A.2
6. Supporting Plans and their Source	State Comprehensive Emergency Management Plan SCEMP): Section IV.C.2 & Section VII	In accordance with SCEMP: Section IV.C.2 & Section VII	In accordance with SCEMP: Section IV.C.2 & Section VII
7. Procedure List to Implement Plan	Standard Operating Procedure (SOP) List is not contained in State Plan. Operating Procedures are available on request.	SOP List is not contained in county plan. Procedures are available on request.	SOP List is not contained in county plan. Procedures are available on request.
8. Table of Contents & Cross Reference	Table of Contents	Table of Contents	Table of Contents
9. Independent review of EP Program	N/A N/A		N/A
10. Quarterly Update of Telephone Numbers	REMP, Chapter 5, Section 1	REMP, Chapter 5, Section 1	REMP, Chapter 5, Section 1

Supplemental Information 6

Withheld under 10 CFR 2.390 as “Sensitive-Federal, State, Foreign Government and International Agency Controlled.” (See COLA Part 9)

State of Florida Radiological Emergency Management Plan (Annex A to State Comprehensive Emergency Plan) (July 2008) – w/o Appendices

(PUBLIC VERSION – REDACTED)

Supplemental Information 7

Withheld under 10 CFR 2.390 as “Sensitive-Federal, State, Foreign Government and International Agency Controlled.” (See COLA Part 9)

State of Florida Radiological Emergency Management Plan Annex A, Appendix II, Turkey Point Nuclear Power Plant Site Plan

(PUBLIC VERSION – REDACTED)

Supplemental Information 8

Withheld under 10 CFR 2.390 as "Sensitive-Federal, State, Foreign Government and International Agency Controlled." (See COLA Part 9)

Radiological Emergency Preparedness Plan, Miami-Dade County, Florida, June 26, 2009

(PUBLIC VERSION - REDACTED)

Supplemental Information 9

Withheld under 10 CFR 2.390 as "Sensitive-Federal, State, Foreign Government and International Agency Controlled." (See COLA Part 9)

Radiological Emergency Preparedness Plan, Monroe County, Florida, August 2008

(PUBLIC VERSION - REDACTED)