BASIS: ESBWR COLA (Entirety)



North Anna 3 Combined License Application Part 10: Tier 1/ ITAAC/Proposed License Conditions

**Revision 5** 

July 2013

#### **REVISION SUMMARY**

#### **Revision 5**

Section	Changes	Reason for Change			
Cover	Changed title from "Tier 1/ITAAC" to "Tier 1/ITAAC/Proposed License Conditions	Added section for license conditions			
Title	Changed from "Tier 1 Information and Inspections, Tests, Analyses, and Acceptance Criteria" to "Tier 1 Information Inspections, Tests, Analyses, and Acceptance Criteria, and Proposed License Conditions"	Added section for license conditions			
2.1	Deleted "in"	Editorial			
2.2	Inserted " for systems within the scope of the DCD"; deleted "in"	Address ITAAC for site-specific Physical Security			
2.2.1	New section	Address ITAAC for site-specific Physical security			
Table 2.2.1-1	New table	Address ITAAC for site-specific Physical security			
Table 2.3-1, Item 1.1 ITA	Inserted "that constitute the bases for the classification scheme"	Consistency with EF3 COLA			
Table 2.3-1,EditorialItems 1.1.1 & 1.1.2AC		Consistency with EF3 COLA			
Table 2.3-1, Items 1.1.2 & 6.1	RAI 13.03-3 - Revised, Emergency Act	ion Levels			
Table 2.3-1, Item 2.1 AC	Corrected number from 2.1.1; changed "A report exists that confirms communications have" to "A means to notify responsible organizations, within 15 minutes after the licensee declares an emergency, has"	Editorial; improve nomenclature per RIS 2008-05 R1			
Table 2.3-1, Item 2.2 EPPE	Changed "COL EP II.D.2" to "COL EP II.E.2"	Editorial			
Table 2.3-1, Item 2.2 AC	Editorial	Improve nomenclature per RIS 2008-05 R1			
Table 2.3-1, Items 2.3, 8.1.1 thru 8.1.3	RAI 13.03-6, Onsite Exercise Objective	RAI 13.03-6, Onsite Exercise Objectives in ITAAC			

Section	Changes	Reason for Change
Table 2.3-1, Item 2.3 AC	Editorial	Improve nomenclature per RIS 2008-05 R1
Table 2.3-1, AC           Items 3.1.1-3.1.1.4,           3.2, 4.1, 5.1.2 - 5.1.7           & 5.2.2, 6.1, 7.1.1,           7.1.2	Editorial	Consistency with EF3 COLA
Table 2.3-1, Item 4.0	Deleted	US-APWR S-COLA RAI 14.03.10-4
Table 2.3-1, Item 5.1, EP	Changed from "operations" to "operational"	Editorial
Table 2.3-1, Item 5.1, AC	Deleted "181 square meters)	Editorial
Table 2.3-1, Item 5.1.1 AC	Editorial; revised to reflect correct values for TSC floor space	Consistency with EF3 COLA
Table 2.3-1, Item 5.2.4 AC	New item	Improve nomenclature per RIS 2008-05 R1
Table 2.3-1, Item 6.2 AC	Corrected number from 6.2.1; revised to include a methodology for determining the magnitude of a release	Editorial; improve nomenclature per RIS 2008-05 R1
Table 2.3-1, Item 6.3 AC	Revised to include continual assessment of the impact from a release of radioactive materials	Improve nomenclature per RIS 2008-05 R1
Table 2.3-1, Item 6.4 ITA & AC	Revised to include differential air temperature and deleted measurement of ambient air temperature at 48.4 m	Improve nomenclature per RIS 2008-05 R1 and consistency with SSAR Section 2.3.3.1.1
Table 2.3-1, Item 6.5 ITA & AC	Revised to include a test of EPIP capabilities	EF3 RAI 13.03-69
Table 2.3-1, Item 6.6 AC	Editorial	Consistency with EF3 COLA
Table 2.3-1, Item 6.7 AC	Revised to include the specified isotopes and comparing the dose estimates with the EPA PAGs	Improve nomenclature per RIS 2008-05 R1
Table 2.3-1, Item 8.1.2	Deleted note	Note is not relevant
Table 2.3-1, Items 8.1.2 & 8.1.3	RAI 13.03-7, Offsite Exercise Objective	es in ITAAC

#### Revision 5 (continued)

Section	Changes	Reason for Change
Table 2.3-1, Item 9.1	RAI 14.03.10-1.1, E-Plan Procedure Su	ubmittal
2.4.1, Table 2.4.1-1	Replaced entirely the changes provided with RAI 02.05.04-20 response with new content to address fill concrete under Seismic Category I structures	EF3 RAI 02.05.04-40
2.4.2	Inserted section and renumbered following sections and tables accordingly (including all citations to those items)	Consistency with EF3 COLA
2.4.3, Table 2.4.3-1 (was 2.4.2 & Table 2.4.2-1)	RAI 09.02.01-8, PSWS Heat Removal	ITAAC Acceptance Criteria
2.4.4 thru 2.4.8, 2.4.10, 2.4.13 & 2.4.14	Changed "No entry" to "No ITAAC are required"	DCD R9
2.4.8, Table 2.4.8-1 (was 2.4.7 & Table 2.4.7-1)	RAI 14.03.06-1, Add ITAAC for Off-site	Power Interface
2.4.8	Deleted duplicate "refer to" in Item 2 of third paragraph of design description	Editorial
2.4.11 (was 2.4.10)	RAI 14.03.07-1, Revise Reference to N	lobile LWMS
2.4.12 (was 2.4.11)	RAI 14.03.07-2, Revise Reference to N	lobile SWMS
2.4.15, Table 2.4.16-1	Added section for Turbine Building	EF3 RAI 03.07.02-5
2.4.16, Table 2.4.16-1	Added section for Radwaste Building ITAAC	EF3 RAI 03.07.02-5
2.4.17, Table 2.4.17-1	Added section for Service Building ITAAC	EF3 RAI 03.07.02-5
2.4.18, Table 2.4.18-1	Added section for Ancillary Diesel Building ITAAC	EF3 RAI 03.07.02-5
3	Added section for license conditions	Future information placeholder

#### Revision 5 (continued)

# Section Changes Table 2.3-1 RAI 14.03.10-1.2, ITAAC Table Correction RAI 14.03.10-1.4, ITAAC for U3 E-Plan Exercise Corrected incomplete reference in EP Program Elements column, 1.1 and reference to EP in Inspection, Tests, Analyses column, 1.1

#### **Revision 1**

#### TIER 1 INFORMATION INSPECTIONS, TESTS, ANALYSES, AND ACCEPTANCE CRITERIA, AND PROPOSED LICENSE CONDITIONS

#### **1.** Tier 1 Information

DCD Tier 1 is incorporated by reference.

#### 2. COLA ITAAC

The Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) for the COLA are provided in tabular form, consistent with the format shown in RG 1.206 Table C.II.1-1.

The COLA-ITAAC consist of the following four parts:

- 1. Design Certification ITAAC
- 2. Emergency Planning ITAAC
- 3. Physical Security ITAAC
- 4. Site-Specific ITAAC

This set of COLA-ITAAC is included herein. Completion of the ITAAC is a proposed condition of the combined license to be satisfied prior to fuel load.

#### 2.1 Design Certification ITAAC

The Design Certification ITAAC are contained in DCD Tier 1, which is incorporated by reference in Section 1.

#### 2.2 Physical Security ITAAC

The Physical Security ITAAC for systems within the scope of the DCD are contained in DCD Tier 1, which is incorporated by reference in Section 1.

#### 2.2.1 Site Specific Physical Security ITAAC

#### **Design Description**

The physical security system provides physical features to detect, delay, assist response to, and defend against the design basis threat (DBT) for radiological sabotage. The physical security system consists of physical barriers and an intrusion detection system. The details of the physical security system are categorized as Safeguards Information. The physical security system provides protection for vital equipment and plant personnel.

- 1. Vital Area and Vital Area Barrier:
  - a. Vital equipment will be located only within a vital area.
  - b. Access to vital equipment will require passage through at least two physical barriers.
- 2. Protected Area Barrier:
  - a. Physical barriers for the protected area perimeter will not be part of vital area barriers.
  - b. Penetrations through the protected area barrier will be secured and monitored.
  - c. Unattended openings that intersect a security boundary, such as underground pathways, will be protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.
- 3. Isolation Zone:
  - a. Isolation zones will exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and will be designed of sufficient size to permit observation and assessment on either side of the barrier.
  - b. Isolation zones will be monitored with intrusion detection and assessment equipment that is designed to provide detection and assessment of activities within the isolation zone.
  - c. Areas where permanent buildings do not allow sufficient observation distance between the intrusion detection system and the protected area barrier (e.g., the building walls are immediately adjacent to, or are an integral part of the protected area barrier) will be monitored with intrusion detection and assessment equipment that is designed to detect the attempted or actual penetration of the protected area perimeter barrier before completed penetration of the barrier and assessment of detected activities.

- 4. Protected Area Perimeter Intrusion Detection and Assessment Systems:
  - a. The perimeter intrusion detection system will be designed to detect penetration or attempted penetration of the protected area perimeter barrier before completed penetration of the barrier, and for subsequent alarms to annunciate concurrently in at least two continuously manned onsite alarm stations (central and secondary alarm stations).
  - b. The perimeter assessment equipment will be designed to provide video image recording with real-time and playback capability that can provide assessment of detected activities before and after each alarm annunciation at the protected area perimeter barrier.
  - c. The intrusion detection and assessment equipment at the protected area perimeter will be designed to remain operable from an uninterruptible power supply in the event of the loss of normal power.
- 5. Isolation zones and exterior areas within the protected area will be provided with illumination to permit assessment in the isolation zones and observation of activities within exterior areas of the protected area.
- 6. The external walls, doors, ceiling, and floors in the Secondary Alarm Station, and the last access control function for access to the protected area will be bullet resistant, to at least Underwriters Laboratories Ballistic Standard 752, "The Standard of Safety for Bullet-Resisting Equipment," Level 4, or National Institute of Justice Standard 0108.01, "Ballistic Resistant Protective Materials," Type III.
- 7. The vehicle barrier system will be designed, installed, and located at the necessary standoff distance to protect against the design-basis threat vehicle bombs.
- 8. Personnel, Vehicle, and Material Access Control Portals and Search Equipment:
  - a. Access control points will be established and designed to control personnel and vehicle access into the protected area.
  - b. Access control points will be established and designed with equipment for the detection of firearms, explosives, and incendiary devices at the protected area personnel access points.
- 9. An access control system with a numbered photo identification badge system will be installed and designed for use by individuals who are authorized access to protected areas and vital areas without escort.
- 10. Unoccupied vital areas will be designed with locking devices and intrusion detection devices that annunciate in the Secondary Alarm Station.
- 11. Alarm Station:
  - a. Intrusion detection equipment and video assessment equipment will annunciate and be displayed concurrently in at least two continuously manned onsite alarm stations (Central and Secondary Alarm Stations).

- b. The Secondary Alarm Station will be located inside the protected area and will be designed so that the interior of the alarm station is not visible from the perimeter of the protected area.
- c. The alarm system will not allow the status of a detection point, locking mechanism or access control device to be changed without the knowledge and concurrence of the alarm station operator in the other alarm station.
- d. Central and Secondary Alarm Stations will be designed, equipped and constructed such that no single act, in accordance with the design-basis threat of radiological sabotage, can simultaneously remove the ability of both the central and secondary alarm stations to 1) detect and assess alarms, 2) initiate and coordinate an adequate response to alarms, 3) summon offsite assistance, and 4) provide effective command and control.
- e. Both the Central and Secondary Alarm Stations will be constructed, located, protected, and equipped to the standards for the Central Alarm Station (alarm stations need not be identical in design but shall be equal and redundant, capable of performing all functions required of alarm stations).
- 12. The secondary security power supply system for alarm annunciator equipment contained in the Secondary Alarm Station and non-portable communications equipment contained in the Secondary Alarm Station is located within a vital area.
- 13. Intrusion Detection Systems Console Display:
  - a. Security alarm devices, including transmission lines to annunciators, will be tamper indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs or when on standby power), and alarm annunciation indicates the type of alarm (e.g., intrusion alarms, emergency exit alarm) and location.
  - b. Intrusion detection and assessment systems will be designed to provide visual display and audible annunciation of alarms in the Secondary Alarm Station.
- 14. Intrusion detection systems recording equipment will record onsite security alarm annunciation including the location of the alarm, false alarm, alarm check, and tamper indication and the type of alarm, location, alarm circuit, date, and time.
- 15. Emergency exits through the protected area perimeter and vital area boundaries will be alarmed with intrusion detection devices and secured by locking devices that allow prompt egress during an emergency.
- 16. Communication:
  - a. The Secondary Alarm Station will have conventional (land line) telephone service with the Main Control Room and local law enforcement authorities.
  - b. The Secondary Alarm Station will be capable of continuous communication with on-duty security force personnel.

c. Non-portable communications equipment in the Secondary Alarm Station will remain operable from an independent power source in the event of loss of normal power.

#### Inspections, Tests, Analyses, and Acceptance Criteria

Table 2.2.1-1 provides a definition of the inspections, tests and analysis, together with associated acceptance criteria for the site-specific portions of the physical security system.

	Design Commitment		sign Commitment Inspections, Tests, Analyses		
1(a).	Vital equipment will be located only within a vital area.	1(a).	All vital equipment locations will be inspected.	1(a).	Vital equipment is located only within a vital area.
1(b).	Access to vital equipment will require passage through at least two physical barriers.	1(b).	All vital equipment physical barriers will be inspected.	1(b).	Vital equipment is located within a protected area such that access to the vital equipment requires passage through at least two physical barriers.
2(a).	Physical barriers for the protected area perimeter will not be part of vital area barriers.	2(a).	The protected area perimeter barriers will be inspected.	2(a).	Physical barriers at the perimeter of the protected area are separated from any other barrier designated as a vital area barrier.
2(b).	Penetrations through the protected area barrier will be secured and monitored.	2(b).	All penetrations through the protected area barrier will be inspected.	2(b).	All penetrations and openings through the protected area barrier are secured and monitored by intrusion detection equipment.
2(c).	Unattended openings that intersect a security boundary, such as underground pathways, will be protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.	2(c).	All unattended openings within the protected area barriers will be inspected.	2(c).	All unattended openings (such as underground pathways) that intersect a security boundary (such as the protected area barrier), are protected by a physical barrier and monitored by intrusion detection equipment or provided surveillance at a frequency sufficient to detect exploitation.
3(a).	Isolation zones will exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and will be designed of sufficient size to permit observation and assessment on either side of the barrier.	3(a).	The isolation zones in outdoor areas adjacent to the protected area perimeter barrier will be inspected.	3(a).	The isolation zones exist in outdoor areas adjacent to the physical barrier at the perimeter of the protected area and are of sufficient size to permit observation and assessment of activities on either side of the barrier in the event of its penetration or attempted penetration.

Table 2.2.1-1	ITAAC for the Site-Specific Security System
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	Design Commitment	Inspections, Tests, Analyses		Acceptance Criteria
3(b).	Isolation zones will be monitored with intrusion detection and assessment equipment that is designed to provide detection and assessment of activities within the isolation zone.	3(b). The intrusion detection equipment within the isolation zones will be inspected.	3(b).	Isolation zones are equipped with intrusion detection and assessment equipment capable of providing detection and assessment of activities within the isolation zone.
3(c).	Areas where permanent buildings do not allow sufficient observation distance between the intrusion detection system and the protected area barrier (e.g., the building walls are immediately adjacent to, or are an integral part of the protected area barrier) will be monitored with intrusion detection and assessment equipment that is designed to detect the attempted or actual penetration of the protected area perimeter barrier before completed penetration of the barrier and assessment of detected activities.	3(c). Inspections of areas of the protected area perimeter barrier that do not have isolation zones will be performed.	3(c).	Areas where permanent buildings do not allow sufficient observation distance between the intrusion detection system and the protected area barrier (e.g., the building walls are immediately adjacent to, or an integral part of, the protected area barrier) are monitored with intrusion detection and assessment equipment that detects attempted or actual penetration of the protected area perimeter barrier before completed penetration of the barrier and assessment of detected activities.
4(a).	The perimeter intrusion detection system will be designed to detect penetration or attempted penetration of the protected area perimeter barrier before completed penetration of the barrier, and for subsequent alarms to annunciate concurrently in at least two continuously manned onsite alarm stations (central and secondary alarm stations).	4(a). Tests, inspections, or a combination of tests and inspections of the intrusion detection system will be performed.	4(a).	The intrusion detection system can detect penetration or attempted penetration of the protected area perimeter barrier before completed penetration of the barrier, and subsequent alarms annunciate concurrently in at least two continuously manned on site alarms stations (central and secondary alarm stations).

	Design Commitment		Inspections, Tests, Analyses		Acceptance Criteria
4(b).	The perimeter assessment equipment will be designed to provide video image recording with real-time and playback capability that can provide assessment of detected activities before and after each alarm annunciation at the protected area perimeter barrier.	4(b).	Tests, inspections, or a combination of tests and inspections of the video assessment equipment will be performed.	4(b).	The perimeter assessment equipment is capable of real-time and playback video image recording that provides assessment of detected activities before and after each alarm at the protected area perimeter barrier
4(c).	The intrusion detection and assessment equipment at the protected area perimeter will be designed to remain operable from an uninterruptible power supply in the event of the loss of normal power.	4(c).	Tests, inspections, or a combination of tests and inspections of the uninterruptible power supply will be performed.	4(c).	All Intrusion detection and assessment equipment at the protected area perimeter remains operable from an uninterruptible power supply in the event of the loss of normal power.
5.	Isolation zones and exterior areas within the protected area will be provided with illumination to permit assessment in the isolation zones and observation of activities within exterior areas of the protected area.	5.	The illumination in isolation zones and exterior areas within the protected area will be inspected.	5.	Illumination in isolation zones and exterior areas within the protected area is 0.2 foot candles measured horizontally at ground level or alternatively augmented, sufficient to permit assessment and observation.
6.	The external walls, doors, ceiling, and floors in the Secondary Alarm Station, and the last access control function for access to the protected area will be bullet resistant, to at least Underwriters Laboratories Ballistic Standard 752, "The Standard of Safety for Bullet-Resisting Equipment," Level 4, or National Institute of Justice Standard 0108.01, "Ballistic Resistant Protective Materials," Type III.	6.	Type test, analysis, or a combination of type test and analysis of the external walls, doors, ceiling, and floors in the Secondary Alarm Station, and the last access control function for access to the protected area will be performed.	6.	A report exists and concludes that the walls, doors, ceilings, and floors in the Secondary Alarm Station, and the last access control function for access to the protected area are bullet resistant to at least Underwriters Laboratories Ballistic Standard 752, Level 4, or National Institute of Justice Standard 0108.01, Type III.

	Design Commitment		Inspections, Tests, Analyses		Acceptance Criteria
7.	The vehicle barrier system will be designed, installed, and located at the necessary standoff distance to protect against the design-basis threat vehicle bombs.	7.	Type test, inspections, analysis or a combination of type tests, inspections, and analysis will be performed for the vehicle barrier system.	7.	A report exists and concludes that the vehicle barrier system will protect against the threat vehicle bombs based on the standoff distance for the system.
8(a).	Access control points will be established and designed to control personnel and vehicle access into the protected area.	8(a).	Tests, inspections, or a combination of tests and inspections of installed systems and equipment will be performed.	8(a).	Access control points exist for the protected area and are configured to control access.
8(b).	Access control points will be established and designed with equipment for the detection of firearms, explosives, and incendiary devices at the protected area personnel access points.	8(b).	Tests, inspections, or a combination of tests and inspections of installed systems and equipment will be performed.	8(b).	Detection equipment exists and is capable of detecting firearms, explosives, and incendiary devices at the protected area personnel access control points.
9.	An access control system with a numbered photo identification badge system will be installed and designed for use by individuals who are authorized access to protected areas and vital areas without escort.	9.	The access control system and the numbered photo identification badge system will be tested.	9.	The access authorization system with a numbered photo identification badge system is installed and provides authorized access to protected and vital areas only to those individuals with unescorted access authorization.
10.	Unoccupied vital areas will be designed with locking devices and intrusion detection devices that annunciate in the Secondary Alarm Station.	10.	Tests, inspections, or a combination of tests and inspections of unoccupied vital area intrusion detection equipment and locking devices will be performed.	10.	Unoccupied vital areas are locked, and intrusion is detected and annunciated in the Secondary Alarm Station.
11(a)	Intrusion detection equipment and video assessment equipment will annunciate and be displayed concurrently in at least two continuously manned onsite alarm stations (Central and Secondary Alarm Stations).	11(a)	). Tests, inspections, or a combination of tests and inspections of intrusion detection equipment and video assessment equipment will be performed.	11(a)	). Intrusion detection equipment and video assessment equipment annunciate and display concurrently in at least two continuously manned onsite alarm stations (Central and Secondary Alarm Stations).

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
11(b). The Secondary Alarm Station will be located inside the protected area and will be designed so that the interior of the alarm station is not visible from the perimeter of the protected area.	11(b). The Secondary Alarm Station location will be inspected.	11(b). The Secondary Alarm Station is located inside the protected area, and the interior of the alarm station is not visible from the perimeter of the protected area.
11(c). The alarm system will not allow the status of a detection point, locking mechanism or access control device to be changed without the knowledge and concurrence of the alarm station operator in the other alarm station.	11(c). Tests, inspections, or a combination of tests and inspections of intrusion detection equipment and access control equipment will be performed.	11(c). The alarm system will not allow the status of a detection point, locking mechanism or access control device to be changed without the knowledge and concurrence of the alarm station operator in the other alarm station.
11(d). Central and Secondary Alarm Stations will be designed, equipped and constructed such that no single act, in accordance with the design-basis threat of radiological sabotage, can simultaneously remove the ability of both the central and secondary alarm stations to 1) detect and assess alarms, 2) initiate and coordinate an adequate response to alarms, 3) summon offsite assistance, and 4) provide effective command and control.	11(d). Tests, inspections, or a combination of tests and inspections of the Central and Secondary Alarm Stations will be performed.	11(d). Central and Secondary Alarm Stations are designed, equipped, and constructed such that no single act, in accordance with the design-basis threat of radiological sabotage, can simultaneously remove the ability of both the central and secondary alarm stations to 1) detect and assess alarms, 2) initiate and coordinate an adequate response to alarms, 3) summon offsite assistance, and 4) provide effective command and control.

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria	
11(e). Both the Central and Secondary Alarm Stations will be constructed, located, protected, and equipped to the standards for the Central Alarm Station (alarm stations need not be identical in design but shall be equal and redundant, capable of performing all functions required of alarm stations).	11(e). Tests, inspections, or a combination of tests and inspections of the Central and Secondary Alarm Stations will be performed.	11(e). The Central and Secondary Alarm Stations are located, constructed, protected, and equipped to the standards of the Central Alarm Station and are functionally redundant (stations need not be identical in design).	
12. The secondary security power supply system for alarm annunciator equipment contained in the Secondary Alarm Station and non-portable communications equipment contained in the Secondary Alarm Station is located within a vital area.	12. The secondary security power supply system will be inspected.	12. The secondary security power supply system for alarm annunciator equipment contained in the Secondary Alarm Station and non-portable communications equipment contained in the Secondary Alarm Station is located within a vital area.	
13(a).Security alarm devices, including transmission lines to annunciators, will be tamper-indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs or when on standby power), and alarm annunciation indicates the type of alarm (e.g., intrusion alarms, emergency exit alarm) and location.	13(a).All security alarm devices and transmission lines will be tested.	13(a).Security alarm devices including transmission lines to annunciators are tamper-indicating and self-checking (e.g., an automatic indication is provided when failure of the alarm system or a component occurs, or when the system is on standby power), and the alarm annunciation indicates the type of alarm (e.g., intrusion alarm, emergency exit alarm) and location.	

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria	
13(b).Intrusion detection and assessment systems will be designed to provide visual display and audible annunciation of alarms in the Secondary Alarm Station.	13(b).Intrusion detection and assessment systems will be tested.	13(b). The intrusion detection and assessment systems provide a visual display and audible annunciation of alarms in the Secondary Alarm Station (concurrently with the display and annunciation in the Central Alarm Station).	
14. No Site-Specific ITAAC specified.	14. No Site-Specific ITAAC specified.	14. No Site-Specific ITAAC specified.	
15. Emergency exits through the protected area perimeter and vital area boundaries will be alarmed with intrusion detection devices and secured by locking devices that allow prompt egress during an emergency.	15. Tests, inspections, or a combination of tests and inspections of emergency exits through the protected area perimeter and vital area boundaries will be performed.	15. Emergency exits through the protected area perimeter and vital area boundaries are alarmed with intrusion detection devices and secured by locking devices that allow prompt egress during an emergency.	
16(a). The Secondary Alarm Station will have conventional (land line) telephone service with the Main Control Room and local law enforcement authorities.	16(a). Tests, inspections, or a combination of tests and inspections of the Secondary Alarm Stations' conventional (land line) telephone service will be performed.	16(a). The Secondary Alarm Station is equipped with conventional (land line) telephone service with the Main Control Room and local law enforcement authorities.	
16(b).The Secondary Alarm Station will be capable of continuous communication with on-duty security force personnel.	16(b).Tests, inspections, or a combination of tests and inspections of the Secondary Alarm Stations' continuous communication capabilities will be performed.	16(b).The Secondary Alarm Station is capable of continuous communication with on-duty watchmen, armed security officers, armed responders, or other security personnel who have responsibilities within the physical protection program and during contingency response events.	

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
16(c).Non-portable communications equipment in the Secondary Alarm Station will remain operable from an independent power source in the event of loss of normal power.	16(c). Tests, inspections, or a combination of tests and inspections of the non-portable communications equipment will be performed.	16(c). All non-portable communication devices (including conventional telephone systems) in the Secondary Alarm Station are wired to an independent power supply that enables those systems to remain operable (without disruption) during the loss of normal power.

#### 2.3 Emergency planning ITAAC

The Emergency Planning ITAAC are provided in Table 2.3-1.

Table 2.3-1	ITAAC For Emergency Planning
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Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
1.0 Emergency Classification Sys	stem		
10 CFR 50.47(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, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.	<ul> <li>1.1 A standard emergency classification and emergency action level (EAL) scheme exists, and identifies facility system and effluent parameters constituting the bases for the classification scheme. [D.1**]</li> <li>[**D.1 corresponds to NUREG-0654 /FEMA-REP-1 evaluation criteria.]</li> <li>ITAAC element addressed in: COL EP II.D.1</li> </ul>	1.1 An inspection of the control room, technical support center (TSC), and emergency operations facility (EOF) will be performed to verify that they have displays for retrieving facility system and effluent parameters that constitute the bases for the classification scheme identified in the Emergency Plan Implementing Procedures (EPIPs).	<ul> <li>1.1.1 The specific parameters identified in the EALs listed in ITA Section 1.1 have been retrieved and displayed in the control room, TSC, and EOF.</li> <li>1.1.2 The ranges available in the control room, TSC, and EOF encompass the values for the specific parameters identified in the EALs listed in ITA Section 1.1.</li> </ul>

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
2.0 Notification Methods and Proc	cedures		
10 CFR 50.47(b)(5) – Procedures have been established for notification, by the licensee, of State and local response organizations and for notification of emergency personnel by all organizations; the content of initial and follow-up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established.	<ul> <li>2.1 The means exist to notify responsible State and local organizations within 15 minutes after the licensee declares an emergency. [E.1]</li> <li>ITAAC element addressed in: COL EP II.E.1</li> </ul>	2.1 A test will be performed of the capabilities.	2.1 A means to notify responsible organizations, within 15 minutes after the licensee declares an emergency, has been established via the Operational Hot Line among the control room, the Commonwealth of Virginia, Caroline County, Hanover County, Louisa County, Orange County, and Spotsylvania County.
	<ul><li>2.2 The means exist to notify emergency response personnel. [E.2]</li><li>ITAAC element addressed in:</li></ul>	2.2 A test will be performed of the capabilities.	2.2 A means exists to notify the NAPS Unit 3 emergency response organization.
	COL EP II.E.2		

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
2.0 Notification Methods and Proc	cedures (continued)		
	<ul> <li>2.3 The means exist to notify and provide instructions to the populace within the plume exposure EPZ. [E.6]</li> <li>ITAAC element addressed in: COL EP II.E.6</li> </ul>	2.3 The full test of notification capabilities will be conducted.	2.3 A means exists to notify and provide instructions to the public in accordance with the emergency plan requirements.

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
3.0 Emergency Communications			
10 CFR 50.47(b)(6) – Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.	3.1 The means exist for communications among the control room, TSC, EOF, principal State and local emergency operations	3.1 A test will be performed of the capabilities.	3.1.1 Communications have been established among the control room, OSC, and TSC.
	centers (EOCs), and radiological field assessment teams. [F.1.d]		3.1.2 Communications have been established among the control room, TSC, and EOF.
	COL EP II.F.1.d		3.1.3 Communications via the Operational Hot Line have been established among the TSC, Commonwealth of Virginia, Caroline County, Hanover County, Louisa County, Orange County, and Spotsylvania County.
			3.1.4 Communications have been established between the TSC and radiological monitoring teams.

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
3.0 Emergency Communications	(continued)		
	<ul> <li>3.2 The means exist for communications from the control room, TSC, and EOF to the NRC headquarters and regional office EOCs (including establishment of the Emergency Response Data System (ERDS) between the onsite computer system and the NRC Operations Center.) [F.1.f]</li> <li>ITAAC element addressed in:</li> </ul>	3.2 A test will be performed of the capabilities.	3.2 Communications have been established from the control room, TSC, and EOF to the NRC headquarters and Region II EOCs and an access port for ERDS is provided.
4.0 Public Education and Informa	COL EP II.F.1.f		
[Deleted]	[Deleted]	[Deleted]	[Deleted]

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Table 2.3-1	ITAAC For Emergency Planning
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Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria		
5.0 Emergency Facilities and Equ	5.0 Emergency Facilities and Equipment				
10 CFR 50.47(b)(8) – Adequate emergency facilities and equipment to support the emergency response are provided and maintained.	<ul> <li>5.1 The licensee has established a technical support center (TSC) and onsite operational support center (OSC). [H.1]</li> <li>ITAAC element addressed in: COL EP II.H.1</li> </ul>	5.1 An inspection of the as-built TSC and OSC will be performed.	<ul> <li>5.1.1 The TSC has at least 1950 square feet of floor space.</li> <li>5.1.2 The following communications equipment have been provided in the TSC and voice transmission and reception have been accomplished: <ul> <li>NRC systems: Emergency Notification System (ENS), Health Physics Network (HPN), Reactor Safety Counterpart Link (RSCL), Protective Measures Counterpart Link (PMCL), Management Counterpart Link (MCL)</li> <li>Dedicated telephone to EOF</li> <li>Dedicated telephone to COSC</li> </ul> </li> </ul>		

Planning Standard	<b>EP Program Elements</b>	Inspections, Tests, Analyses	Acceptance Criteria	
5.0 Emergency Facilities and Equipment (continued)				
			5.1.3 The TSC has been located in the Electrical Building.	
			5.1.4 The TSC includes radiation monitors and a ventilation system with a high efficiency particulate air (HEPA) and charcoal filter.	
			5.1.5 A back-up electrical power supply is available for the TSC.	
			5.1.6 The OSC is in a location separate from the control room.	
			5.1.7 The following communications equipment have been provided in the OSC and voice transmission and reception have been accomplished:	
			<ul> <li>Dedicated telephone to control room</li> </ul>	
			<ul> <li>Dedicated telephone to TSC</li> </ul>	
			<ul> <li>Plant page system (voice transmission only)</li> </ul>	

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria			
5.0 Emergency Facilities and Eq	.0 Emergency Facilities and Equipment (continued)					
5.0 Emergency Facilities and Eq	<ul> <li>5.2 The licensee has established an emergency operations facility (EOF). [H.2]</li> <li>ITAAC element addressed in: COL EP II.H.2</li> </ul>	5.2 An inspection of the EOF will be performed.	<ul> <li>5.2.1 A report exists that confirms the EOF has at least 243 square meters (2,625 square feet).</li> <li>5.2.2 Voice transmission and reception have been accomplished between the EOF and TSC.</li> <li>5.2.3 A report exists that confirms voice transmission and reception have been accomplished via the Operational Hot Line among the EOF, Commonwealth of Virginia, Caroline County, Hanover County, Louisa County, Orange County, and Spotsylvania County.</li> <li>5.2.4 The EOF has the means to acquire, display and evaluate radiological, meteorological, and plant system data pertinent to determining offsite protective measures.</li> </ul>			

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
6.0 Accident Assessment			
10 CFR 50.47(b)(9) – Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.	<ul> <li>6.1 The means exist to provide initial and continuing radiological assessment throughout the course of an accident. [I.2]</li> <li>ITAAC element addressed in: COL EP II.1.2, Appendix 2</li> </ul>	6.1 A test of the emergency plan will be conducted by performing an exercise or drill to verify the capability to perform accident assessment.	<ul> <li>6.1 An exercise or drill has been accomplished, including use of selected monitoring parameters identified in the EAL thresholds listed in the EPIPs, to assess simulated degraded plant conditions and initiate protective actions in accordance with the following criteria:</li> <li>A. Accident Assessment and Classification</li> <li>1. Initiating conditions identified, EAL parameters determined, and the emergency correctly classified throughout the drill.</li> <li>2. Protective action recommendations developed and communicated to appropriate authorities.</li> </ul>

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria		
6.0 Accident Assessment (contin	5.0 Accident Assessment (continued)				
			B. Radiological Assessment and Control		
			<ol> <li>Onsite radiological surveys performed and samples collected.</li> </ol>		
			<ol> <li>Radiation exposure of emergency workers monitored and controlled.</li> </ol>		
			<ol> <li>Field monitoring teams assembled and deployed.</li> </ol>		
			<ol> <li>Field team data collected and disseminated.</li> </ol>		
			5. Dose projections developed.		
			<ol> <li>The decision whether to issue radioprotective drugs to NAPS emergency workers made.</li> </ol>		

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
6.0 Accident Assessment (	continued)		
	<ul> <li>6.2 The means exist to determine the source term of releases of radioactive material within plant systems, and the magnitude of the release of radioactive materials based on plant system parameters and effluent monitors. [I.3]</li> <li>ITAAC element addressed in: COL EP II.1.3, Appendix 2</li> </ul>	6.2 An analysis of emergency plan implementing procedures (EPIPs) and the Offsite Dose Calculation Manual (ODCM) will be completed to verify the ability to determine the source term and magnitude of release.	6.2 The EPIPs and ODCM correctly calculate source terms and magnitudes of postulated releases.
	<ul> <li>6.3 The means exist to continuously assess the impact of the release of radioactive materials to the environment, accounting for the relationship between effluent monitor readings, and onsite and offsite exposures and contamination for various meteorological conditions. [I.4]</li> <li>ITAAC element addressed in:</li> </ul>	6.3 An analysis of emergency plan implementing procedures (EPIPs) and the Offsite Dose Calculation Manual (ODCM) will be completed to verify the relationship between effluent monitor readings and offsite exposures and contamination for various meteorological conditions has been established.	6.3 The EPIPs and the ODCM calculate the relationship between effluent monitor readings and offsite exposures and contamination for various meteorological conditions.
	COL EP II.I.4, Appendix 2		

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
6.0 Accident Assessment (continu	ued)		
	<ul><li>6.4 The means exist to acquire and evaluate meteorological information. [I.5]</li><li>ITAAC element addressed in: COL EP II.1.5</li></ul>	<ul> <li>6.4 An inspection of the control room, TSC, and EOF will be performed to verify the availability of the following meteorological data:</li> <li>Wind speed (at 10 m and 48.4 m)</li> <li>Wind direction (at 10 m and 48.4 m)</li> <li>Ambient air temperature (at 10 m)</li> <li>Differential air temperature (between 10 m and 48.4 m)</li> </ul>	<ul> <li>6.4 The following meteorological data is available in the control room, TSC, and EOF:</li> <li>Wind speed (at 10 m and 48.4 m)</li> <li>Wind direction (at 10 m and 48.4 m)</li> <li>Ambient air temperature (at 10 m)</li> <li>Differential air temperature (between 10 m and 48.4 m)</li> </ul>

Table 2.3-1	ITAAC For Emergency Planning
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Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
6.0 Accident Assessment (	(continued)		
	<ul> <li>6.5 The means exist to make rapid assessments of actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways, including activation, notification means, field team composition, transportation, communication, monitoring equipment, and estimated deployment times. [I.8]</li> <li>ITAAC element addressed in: COL EP II.1.8</li> </ul>	6.5 A test will be performed of the capabilities.	6.5 Demonstrate the capability for making rapid assessment of the actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways.
	<ul> <li>6.6 The capability exists to detect and measure radioiodine concentrations in air in the plume exposure EPZ, as low as 10-7 μCi/cc (microcuries per cubic centimeter) under field conditions. [I.9]</li> <li>ITAAC element addressed in:</li> </ul>	6.6 A test of NAPS field survey instrumentation will be performed to verify the capability to detect airborne concentrations as low as 1E-07 microcuries per cubic centimeter.	<ul> <li>6.6 Instrumentation used for monitoring I-131 to detect airborne concentrations as low as 1E-07 microcuries per cubic centimeter has been provided.</li> </ul>
	COL EP II.I.9		

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Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
6.0 Accident Assessment (contin	ued)		
	<ul> <li>6.7 The means exist to estimate integrated dose from the projected and actual dose rates, and for comparing these estimates with the EPA protective action guides (PAGs). [I.10]</li> <li>ITAAC element addressed in: COL EP II.I.10, Appendix 2</li> </ul>	6.7 An analysis of emergency plan implementing procedures will be performed to verify that a methodology is provided to establish means for relating contamination levels and airborne radioactivity levels to dose rates and gross radioactivity measurements for the following isotopes – Kr-88, Ru-106, I-131, I-132, I-133, I-134, I-135, Te-132, Xe-133, Xe-135, Cs-134, Cs-137, Ce-144.	6.7 A report exists and concludes a methodology has been established for relating contamination levels and airborne radioactivity levels to dose rates and gross radioactivity measurements for the specified isotopes (Kr-88, Ru-106, I-131, I-132, I-133, I-134, I-135, Te-132, Xe-133, Xe-135, Cs-134, Cs-137, Ce-144), and for comparing the dose estimates with the EPA PAGs.

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
7.0 Protective Response			
10 CFR 50.47(b)(10) – A range of protective actions has been developed for the plume exposure EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure EPZ appropriate to the locale have been developed.	<ul> <li>7.1 The means exist to warn and advise onsite individuals of an emergency, including those in areas controlled by the operator, including: [J.1]</li> <li>a. employees not having emergency assignments;</li> <li>b. visitors;</li> <li>c. contractor and construction personnel; and</li> <li>d. other persons who may be in the public access areas, on or passing through the site, or within the owner controlled area.</li> <li>ITAAC element addressed in: COL EP II.J.1</li> </ul>	7.1 A test of the onsite warning and communications capability will be performed during a drill or exercise.	<ul> <li>7.1.1 During a drill or exercise, notification and instructions were provided to onsite workers and visitors, within the Protected Area, over the plant public announcement system.</li> <li>7.1.2 During a drill or exercise, audible warnings were provided to individuals outside the Protected Area, but within the Owner Controlled Area.</li> </ul>

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills			
10 CFR 50.47(b)(14) – Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.	8.1 Licensee conducts a full-participation exercise to evaluate major portions of emergency response capabilities, which includes participation by each State and local agency within the plume exposure EPZ, and each State within the ingestion control EPZ. [N.1]	8.1 A full-participation exercise (test) will be conducted within the specified time periods of Appendix E to 10 CFR Part 50.	8.1.1 The exercise is completed within the specified time periods of 10 CFR 50, Appendix E, and a report exists that confirms onsite exercise objectives listed below have been met and there are no uncorrected onsite exercise deficiencies.
	ITAAC element addressed in:		(continued)
	COL EP II.N.1		

past events impact on t conditions, minutes fro the initiating		Acceptance Criteria	Tests, Analyses	Inspections,	EP Program Elements	Planning Standard
A. Accident Assess Classification  1. Demonstrate to identify initi conditions, de emergency ad (EAL) parame correctly class emergency th the exercise.  Standard Critt  a. Determine i highest em classificatic based on e which were progress, co past events impact on t conditions, minutes fro					ued)	8.0 Exercises and Drills (co
Classification  1. Demonstrate to identify initi conditions, de emergency aa (EAL) parame correctly class emergency th the exercise.  Standard Critt a. Determine i highest em classificatio based on e which were progress, c past events impact on t conditions, minutes fro the initiating		8.1.1 (continued)				
to identify initi conditions, de emergency ad (EAL) parame correctly class emergency th the exercise. Standard Crite a. Determine 1 highest em classificatio based on e which were progress, c past events impact on t conditions, minutes fro the initiating						
a. Determine highest em classificatio based on e which were progress, c past events impact on t conditions, minutes fro the initiating	nitiating determine action leve meters, and assify the throughout	to identify init conditions, do emergency a (EAL) param correctly clas emergency th				
highest em classificatio based on e which were progress, c past events impact on t conditions, minutes fro the initiating	criteria:	Standard Crit				
is (are) ider	emergency ation level n events ere in s, considerin ents and thei on the currer ns, within 15 from the tim iting n(s) or EAL(s	highest em classification based on em which were progress, of past event impact on conditions, minutes from the initiation condition(st				

Planning Standard	<b>EP Program Elements</b>	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (co	ontinued)		
			8.1.1 (continued)
			B. Notifications
			<ol> <li>Demonstrate the ability to alert, notify, and mobilize site emergency response personnel.</li> </ol>
			Standard Criteria:
			a. Initiate activation of the emergency recall system following initial event classification for an Alert or higher.
			(continued

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (co	ontinued)		
			8.1.1 (continued)
			2. Demonstrate the ability to notify responsible State and local government agencies within 15 minutes and the NRC within 60 minutes after declaring an emergency.
			a. Initiate transmittal of initial information to the Commonwealth of Virginia and risk jurisdictions using the designated emergency plan implementing procedure (EPIP) within 15 minutes of event classification.
			(continued)

Planning Standard	<b>EP Program Elements</b>	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (co	ntinued)		
			8.1.1 (continued)
			<ul> <li>b. Initiate transmittal of follow-up information to the Commonwealth of Virginia and risk jurisdictions using the designated EPIP within appropriate interval.</li> </ul>
			c. Initiate transmittal of initial information to the Nuclear Regulatory Commission (NRC) using the designated EPIP within 60 minutes of event classification.
			(continued

Planning Standard	<b>EP Program Elements</b>	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (co	ntinued)		
			8.1.1 (continued)
			<ol> <li>Demonstrate the ability to warn or advise onsite individuals of emergency conditions.</li> </ol>
			Standard Criteria:
			a. Initiate notification of onsite individuals (via plant page or telephone), using the designated EPIP within 15 minutes of notification.
			<ol> <li>Demonstrate the capability of the Alert and Notification System (ANS) sirens to operate properly when required.</li> </ol>
			Standard Criteria:
			a. 90% of the sirens operate properly. (continued)

Planning Standard	<b>EP Program Elements</b>	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (co	ntinued)		
			8.1.1 (continued)
			C. Emergency Response
			<ol> <li>Demonstrate the capability to direct and control emergency operations.</li> </ol>
			Standard Criteria:
			a. Command and control is demonstrated by the control room in the early phase of the emergency and the technical support center (TSC), after its activation.
			(continued

Planning Standard	EP Program Elements	Inspections,	Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (continue	ed)			
				8.1.1 (continued)
				<ol> <li>Demonstrate the ability to transfer emergency direction from the control room (simulator) to the TSC.</li> </ol>
				Standard Criteria:
				a. Briefings were conducted prior to turnover responsibility. Personnel document transfer of duties.
				<ol> <li>Demonstrate the ability to prepare for around-the-clock staffing requirements.</li> </ol>
				Standard Criteria:
				a. Complete 24-hour staff assignments. <i>(continued</i> )

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (contin	ued)		
			8.1.1 (continued)
			4. Demonstrate the ability to perform assembly and accountability for all onsite individuals during an emergency requiring protected area assembly and accountability.
			Standard Criteria:
			a. Protected area personnel assembly and accountability completed within 30 minutes following initiation of assembly and accountability measures.
			(continued)

Planning Standard	<b>EP Program Elements</b>	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (co	ontinued)		
			8.1.1 (continued)
			D. Emergency Response Facilities
			<ol> <li>Demonstrate activation of the operational support center (OSC), and full functional operation of the TSC and emergency operations facility (EOF).</li> </ol>
			Standard Criteria:
			a. The TSC, OSC, and EOF are activated within about 60 minutes of the initial notification.
			(continued

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (conti	inued)		
			8.1.1 (continued)
			2. Demonstrate the adequacy of equipment, security provisions, and habitability precautions for the TSC, OSC, EOF, and joint information center (JIC), as appropriate.
			Standard Criteria:
			a. Demonstrate the adequacy of the emergency equipment in the emergency response facilities.
			b. The <i>Security Team</i> <i>Leader</i> implements and follows applicable EPIPs. <i>(continued)</i>

Planning Standard	EP Program Elements	Inspections,	Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (continue	d)			
				8.1.1 (continued)
				c. The Health Physics (HP) personnel implement the designated EPIP provisions if an onsite or offsite release has occurred.
				<ol> <li>Demonstrate the adequacy of communications for all emergency support resources.</li> </ol>
				Standard Criteria:
				a. Emergency response facility personnel are able to operate all specified communication systems.
				(continued)

Planning Standard	<b>EP Program Elements</b>	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (co	ontinued)		
			8.1.1 (continued)
			b. Clear primary or backup communications link are established and maintained for the duration of the exercise.
			E. Radiological Assessment and Control
			<ol> <li>Demonstrate the ability to obtain onsite radiological surveys an samples.</li> </ol>
			Standard Criteria:
			a. HP personnel demonstrate the ability to obtain appropriate instruments (range and type) and take surveys.
			(continued

Planning Standard	<b>EP Program Elements</b>	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (co	ntinued)		
			8.1.1 (continued)
			<ul> <li>b. Airborne samples are taken when the conditions indicate the need for the information.</li> </ul>
			<ol> <li>Demonstrate the ability to continuously monitor and control radiation exposure to emergency workers.</li> </ol>
			Standard Criteria:
			a. Emergency workers are issued selfreading dosimeters when radiation levels require, and exposures are controlled to 10 CFR 20
			occupational dose limits (unless the Emergency Coordinator/EOF
			Director authorizes emergency limits).
			(continued

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (co	ntinued)		
			8.1.1 (continued)
			b. Exposure records are available.
			c. Emergency workers include Security and personnel within all emergency facilities.
			<ol> <li>Demonstrate the ability to assemble and deploy field monitoring teams.</li> </ol>
			Standard Criteria:
			a. One field monitoring team is ready to be deployed within 60 minutes of being requested, and no later than 90 minutes from the declaration of an Alert or higher emergency.
			(continued)

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (co	ontinued)		
			8.1.1 (continued)
			<ol> <li>Demonstrate the ability to satisfactorily collect and disseminate field team data.</li> </ol>
			Standard Criteria:
			a. Field team data to be collected is dose rate or counts per minute (cpm) from the plume, both open and closed window, and air sample (gross/net cpm) for particulate and iodine, if applicable.
			b. Satisfactory data dissemination is from the field team to HP ( <i>Plume</i> <i>Tracking/Dose</i> <i>Assessment</i> ) personnel.
			(continued

Planning Standard	<b>EP Program Elements</b>	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (co	ontinued)		
			8.1.1 (continued)
			<ol> <li>Demonstrate the ability to develop dose projections.</li> </ol>
			Standard Criteria:
			a. Timely and accurate dose projections are performed in accordance with EPIPs.
			<ol> <li>Demonstrate the ability to make the decision whether to issue radioprotective drugs to emergency workers.</li> </ol>
			Standard Criteria:
			a. Radioprotective drugs are taken (simulated) if the estimated dose to the thyroid will exceed 25 rem committed dose equivalent (CDE).
			(continue

Planning Standard	<b>EP Program Elements</b>	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (co	ontinued)		
			8.1.1 (continued)
			<ol> <li>Demonstrate the ability to develop appropriate protective action recommendation(s) (PAR(s)) and notify appropriate authorities within 15 minutes of development.</li> </ol>
			Standard Criteria:
			a. Total effective dose equivalent (TEDE) and CDE dose projections from the dose assessment computer code are compared to criteria in EPIPs.
			b. PAR(s) is (are) developed within 15 minutes of data availability, as appropriate.
			(continue

Planning Standard	<b>EP Program Elements</b>	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (co	ontinued)		
			8.1.1 (continued)
			c. PAR(s) is (are) transmitted to responsible State an local government agencies within 15 minutes of development.
			F. Public Information
			<ol> <li>Demonstrate the capability to develop and disseminate clear, accurate, and timely information to the news media.</li> </ol>
			Standard Criteria:
			a. Media information (e.g., press releases press briefings, electronic media) is made available following notification of Dominion Externa Affairs personnel. <i>(continue</i> )

Planning Standard	<b>EP Program Elements</b>	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (co	ntinued)		
			8.1.1 (continued)
			2. Demonstrate the capability to establish and effectively operate rumor control in a coordinated fashion.
			Standard Criteria:
			a. Calls are answered ir a timely manner with the correct information.
			<ul> <li>Rumors are identified and addressed.</li> </ul>
			(continued

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (conti	nued)		
			8.1.1 (continued)
			G. Evaluation
			<ol> <li>Demonstrate the ability to conduct a post-exercise critique, to determine areas requiring improvement and corrective action.</li> </ol>
			Standard Criteria:
			a. An exercise time-line is developed, followed by an evaluation of the objectives.
			b. Significant problems in achieving the objectives are discussed to ensure understanding of why objectives were not fully achieved.
			c. Recommendations for improvement in non-objective areas are discussed.

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
8.0 Exercises and Drills (co	ontinued)		
			8.1.2 Onsite emergency response personnel are mobilized in sufficient number to fill the emergency positions identified in COL EP II.B, Onsite Emergency Organization, and a report exists that confirms they successfully perform their assigned responsibilities as outlined in Acceptance Criterion 8.1.1.D, Emergency Response Facilities.
			8.1.3 The exercise is completed within the specified time periods of 10 CFR 50, Appendix E, a report exists that confirms offsite exercise objectives have been met and there are no uncorrected offsite deficiencies, or a license condition requires offsite deficiencies to be corrected prior to operation above 5% of rated power.

Planning Standard	EP Program Elements	Inspections, Tests, Analyses	Acceptance Criteria
9.0 Implementing Procedures			
10 CFR 50, Appendix E.V – No less than 180 days prior to the scheduled issuance of an operating license for a nuclear power reactor or a license to possess nuclear material, the applicant's detailed implementing procedures for its emergency plan shall be submitted to the Commission.	9.1 The licensee has submitted detailed implementing procedures for its emergency plan no less than 180 days prior to fuel load.	9.1 An inspection will be performed to confirm that the detailed implementing procedures for the Unit 3 Emergency Plan were submitted to the NRC.	<ul> <li>9.1 Each of the detailed implementing procedures for the Unit 3 Emergency Plan, as defined in Appendix 5 of the Emergency Plan, are submitted to the NRC no less than 180 days prior to fuel load.</li> </ul>

### 2.4 Site-Specific ITAAC

The Site Specific ITAAC are provided in the following sections. Site specific systems were evaluated against selection criteria in Section 14.3. If a site-specific system described in the FSAR does not meet an ITAAC selection criterion, only the system name and the statement "No entry for this system" is provided.

#### 2.4.1 ITAAC for Fill Concrete Under Seismic Category I Structures

Compactible backfill will not be placed under Unit 3 Seismic Category I structures. ITAAC for fill concrete placed under Seismic Category I structures to a thickness greater than 5 feet are provided in Table 2.4.1-1.

## Table 2.4.1-1 ITAAC for Fill Concrete Under Seismic Category I Structures

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
<ol> <li>The foundation grade for the FWSC will be established using fill concrete. Fill concrete placed under Seismic Category I Structures to a thickness greater than 5 feet is designed and tested as specified in FSAR Section 2.5.</li> </ol>	Testing will be performed to determine the mean compressive strength for the fill concrete.	A report exists that demonstrates that the mean 28-day compressive strength of the fill concrete is equal to, or greater than, 17.2 MPa (2,500 psi).

# 2.4.2 ITAAC for Backfill Surrounding Seismic Category I Structures

Not used.

## 2.4.3 ITAAC FOR Plant Service Water System (portion outside the scope of the certified design)

#### **Design Description**

The Plant Service Water System (PSWS) is the heat sink for the Reactor Component Cooling Water System. The PSWS does not perform any safety-related function. There is no interface with any safety-related component.

The PSWS cooling towers and basin are not within the scope of the certified design. A specific design for this portion of the PSWS is described in FSAR Section 9.2.1. Interface requirements are necessary for supporting the post-72-hour cooling function of the PSWS. The plant-specific portion of the PSWS shall meet the following interface requirement:

The volume of water shall be sufficient such that no active makeup shall be necessary to remove  $2.02 \times 10^7$  MJ ( $1.92 \times 10^{10}$  BTU) over a period of seven days. Additionally, the PSWS pumps must have sufficient available net positive suction head at the pump suction location for the lowest probable water level of the heat sink.

### Inspections, Test, Analyses and Acceptance Criteria

Table 2.4.3-1 provides a definition of the inspections, tests, and/or analyses, together with associated acceptance criteria for the PSWS.

## Table 2.4.3-1 ITAAC for Plant Service Water Reserve Storage Capacity

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
<ol> <li>The volume of water in the PSWS basin shall be sufficient such that:</li> </ol>		
a. No active makeup shall be necessary to remove $2.02 \times 10^7$ MJ ( $1.92 \times 10^{10}$ BTU) over a period of seven days.	Inspections and analysis will be performed of the PSWS basin and cooling towers.	A report exists and concludes that the volume of water in the PSWS basin is sufficient such that no active makeup is necessary to remove $2.02 \times 10^7$ MJ ( $1.92 \times 10^{10}$ BTU) over a period of seven days.
b. The PSWS pumps must have sufficient available net positive suction head at the pump suction location for the lowest probable water level of the heat sink.	Inspections and analysis will be performed of the PSWS basin.	A report exists and concludes that the PSWS pumps have sufficient available net positive suction head at the pump suction location for the lowest probable water level of the heat sink.

2.4.4 **Circulating Water System (portion outside the scope of the certified design)** No ITAAC are required for this system.

#### 2.4.5 Station Water System (including intake structure and servicing equipment)

No ITAAC are required for this system.

## 2.4.6 Yard Fire Protection System (portions outside scope of certified design)

No ITAAC are required for this system.

#### 2.4.7 **Potable & Sanitary Water Systems**

No ITAAC are required for this system.

#### 2.4.8 **Offsite Power Systems**

#### Design Description

The offsite portion of the Preferred Power Supply (PPS) consists of at least two electrical circuits and associated equipment that are used to interconnect the offsite transmission system with the plant main generator and the onsite portions of the PPS. The PPS consists of the normal preferred and alternate preferred power sources and includes those portions of the offsite power system and the onsite power system required for power flow from the offsite transmission system to the safety-related Isolation Power Centers (IPC) incoming line breakers.

The interface between the normal preferred ESBWR certified plant onsite portion of the PPS and the site-specific offsite portion of the PPS is at the switchyard side terminals of the high side motor operated disconnects (MODs) of the UAT circuit breaker and main generator circuit breaker. The interface between the alternate preferred ESBWR certified plant onsite portion of the PPS and the site specific offsite portion of the PPS is at the switchyard side terminals of the RAT high side MODs.

The as-built offsite portion of the PPS, from the transmission network to the interface with the onsite portions of the PPS, satisfies the applicable provisions of GDC 17. Specifically, the offsite portion of the PPS shall meet the following interface requirements:

- 1. At least two independent circuits supply electric power from the transmission network to the interface with the onsite portions of the PPS.
- Each offsite circuit interfacing with the onsite portions of the PPS is adequately rated to supply the load requirements during design basis operating modes (refer to DCD ITAAC 2.13.1-2, Item 9).
- 3. Under normal steady state operation of the transmission system, the offsite portion of the PPS is capable of supplying voltage at the interface with the onsite portions of the PPS that will support operation of safety-related loads during design basis operating modes.

- 4. Under normal steady state operation of the transmission system, the offsite portion of the PPS is capable of supplying required frequency at the interface with the onsite portions of the PPS that will support operation of safety-related loads during design basis operating modes.
- 5. The fault current contribution of the offsite portion of the PPS is compatible with the interrupting capability of the onsite fault current interrupting devices.

#### Inspections, Test, Analyses and Acceptance Criteria

Table 2.4.8-1 provides a definition of the inspections, tests, and/or analyses, together with associated acceptance criteria for the Offsite Power Systems.

#### **Design Commitment** Inspections, Tests, Analyses **Acceptance Criteria** 1. Independent offsite power sources supply electric power from the transmission network to the interface with the onsite PPS. a. A minimum of two offsite power circuits are a. Inspections of the as-built offsite power a. A report exists and concludes the provided to the interface with the onsite supply transmission system will be following inspection results: PPS and are physically separate. performed. i) At least two offsite transmission circuits are provided to the interface with the onsite PPS. ii) The two offsite power circuits are physically separated by distance or physical barriers so as to minimize to the extent practical the likelihood of their simultaneous failure under design basis conditions. iii) The two offsite power circuits do not have a common takeoff structure or use a common structure for support. b. Test of the as-built offsite power system b. The two offsite power circuits interfacing b. A report exists and concludes that a will be conducted by providing a test with the onsite PPS are electrically test signal exists in only the circuit signal in only one offsite power circuit at a independent. under test. time. c. Tests of the as-built offsite breaker c. The breaker control power, c. A report exists and concludes that a instrumentation, and control circuits for the control power, instrumentation, and test signal exists in only the circuit two offsite power circuits interfacing with control circuits will be conducted by under test. providing a test signal in only one offsite the onsite PPS are electrically independent. power circuit at a time.

### Table 2.4.8-1 ITAAC for Offsite Power Systems

## Table 2.4.8-1 ITAAC for Offsite Power Systems

Des	sign Commitment	Ins	pections, Tests, Analyses	Acceptance Criteria	
2.	At least two offsite power circuits interfacing with the onsite portions of the PPS are each adequately rated to supply necessary load requirements during design basis operating modes.	2.	Analyses of the offsite power system will be performed to evaluate the as-built ratings of each offsite power circuit interfacing with the onsite portions of the PPS against the load requirements determined in DCD ITAAC 2.13.1-2, Item 9.	2.	A report exists and concludes that at least two offsite power circuits from the transmission network up to the interface with the onsite portions of the PPS are each rated to supply the load requirements, during design basis operating modes, of their respective safety-related and nonsafety-related load groups.
3.	Under normal steady state operation of the transmission system, the offsite portion of the PPS is capable of supplying required voltage to the interface with the onsite portions of the PPS that will support operation of safety-related loads during design basis operating modes.	3.	Analyses of the as-built offsite portion of the PPS will be performed to evaluate the capability of each offsite power circuit to supply the voltage requirements at the interface with the onsite portion of the PPS determined in DCD ITAAC 2.13.1-2, Item 9.	3.	A report exists and concludes that as-built offsite portion of the PPS, under normal steady state operation of the transmission system, is capable of supplying voltage at the interface with the onsite portions of the PPS that will support operation of safety-related loads during design basis operating modes.
4.	Under normal steady state operation of the transmission system, the offsite portion of the PPS is capable of supplying required frequency to the interface with the onsite portions of the PPS that will support operation of safety-related loads during design basis operating modes.	4.	Analyses of the as-built offsite portion of the PPS will be performed to evaluate the capability of each offsite power circuit to supply the frequency requirements at the interface with the onsite portions of the PPS determined in DCD ITAAC 2.13.1-2, Item 9.	4.	A report exists and concludes that as-built offsite portion of the PPS, under normal steady state operation of the transmission system, is capable of supplying required frequency at the interface with the onsite portions of the PPS that will support operation of safety-related loads during design basis operating modes.

## Table 2.4.8-1 ITAAC for Offsite Power Systems

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria	
5. The fault current contribution of the offsite portion of the PPS is compatible with the interrupting capability of the onsite short circuit interrupting devices.	<ol> <li>Analyses of the as-built offsite portion of the PPS will be performed to evaluate the fault current contribution of each offsite power circuit at the interface with the onsite portions of the PPS.</li> </ol>	5. A report exists and concludes the short circuit contribution of the as-built offsite portion of the PPS at the interface with the onsite portions of the PPS is compatible with the interrupting capability of the onsite fault current interrupting devices as determined in DCD ITAAC 2.13.1-2, Item 10.	

#### 2.4.9 **Communications Systems (Emergency Notification System)**

Addressed in Table 2.3-1, 3.0 Emergency Communications

#### 2.4.10 Makeup Water System

No ITAAC are required for this system.

#### 2.4.11 (Deleted)

#### 2.4.12 (Deleted)

#### 2.4.13 Hydrogen Water Chemistry System

No ITAAC are required for this system.

#### 2.4.14 Meteorological Monitoring System

No ITAAC are required for this system.

#### 2.4.15 **ITAAC for the Turbine Building**

#### **Design Description**

The Turbine Building is a Seismic Category II building. The design and analysis of the Turbine Building will preclude any adverse interaction with Seismic Category I structures, considering the soil properties. If necessary, soil-structure interaction (SSI) analyses using Unit 3 soil properties will be performed following the same methodology used in the ESBWR Standard Plant Turbine Building seismic SSI analyses.

#### Inspections, Test, Analyses and Acceptance Criteria

Table 2.4.15-1 provides a definition of the inspections, tests, and/or analyses, together with associated acceptance criteria for the Turbine Building.

## Table 2.4.15-1 ITAAC for the Turbine Building

Design Commitment		Inspections, Tests, Analyses	Acceptance Criteria
the site   Table 5. seismic analyses be perfo The Unit analyses used in t	ne if the Unit 3 soil properties meet parameters in DCD Tier 1 1-1. If not, then Unit 3 site-specific soil-structure interaction (SSI) s using the Unit 3 soil properties will prmed for the Turbine Building (TB). t 3 TB site-specific seismic SSI s shall follow the same methodology the ESBWR TB seismic analyses d in DCD Tier 1 ITAAC 16.8-1.	Unit 3 soil properties will be determined. Site-specific SSI and structure-soil-structure interaction (SSSI) analyses of the TB will be conducted, if necessary.	The Unit 3 soil properties either 1) meet the site parameters in DCD Tier 1 Table 5.1-1, or 2) site-specific SSI analyses will be conducted. The results of Unit 3 site-specific seismic SSI analyses of the TB are compared with the ESBWR TB seismic responses presented in DCD Tier 1 ITAAC Table 2.16.8-1 seismic analyses to confirm the Unit 3 SSI is adequate for the ESBWR TB seismic design.

#### 2.4.16 ITAAC for the Radwaste Building

#### **Design Description**

The Radwaste Building is a Seismic Category NS building. The design and analysis of the Radwaste Building will preclude any adverse interaction with Seismic Category I structures, considering the soil properties. If necessary, soil-structure interaction (SSI) analyses using Unit 3 soil properties will be performed following the same methodology used in the ESBWR Standard Plant Radwaste Building seismic SSI analyses.

#### Inspections, Tests, Analyses, and Acceptance Criteria

Table 2.4.16-1 provides a definition of the inspections, tests, and/or analyses, together with associated acceptance criteria for the Radwaste Building.

## Table 2.4.16-1 ITAAC for the Radwaste Building

Design Commitment		Inspections, Tests, Analyses	Acceptance Criteria
the site pa Table 5.1- seismic se analyses be perforn (RW). The SSI analy methodole seismic a	he if the Unit 3 soil properties meet arameters in DCD Tier 1 -1. If not, then Unit 3 site-specific oil-structure interaction (SSI) using the Unit 3 soil properties will med for the Radwaste Building e Unit 3 RW site-specific seismic rses shall follow the same ogy used in the ESBWR RW nalyses specified in DCD Tier 1 ble 2.16.9-1.	Unit 3 soil properties will be determined. Site-specific SSI and structure-soil-structure interaction (SSSI) analyses of the RW will be conducted, if necessary.	The Unit 3 soil properties either 1) meet the site parameters in DCD Tier 1 Table 5.1-1, or 2) site-specific SSI analyses will be conducted. The results of Unit 3 site-specific seismic SSI analyses of the RW are compared with the ESBWR RW seismic responses presented in DCD Tier 1 ITAAC Table 2.16.9-1 seismic analyses to confirm the Unit 3 SSI is adequate for the ESBWR RW seismic design.

#### 2.4.17 ITAAC for the Service Building

#### **Design Description**

The Service Building is a Seismic Category II building. The design and analysis of the Service Building will preclude any adverse interaction with Seismic Category I structures, considering the soil properties. If necessary, soil-structure interaction (SSI) analyses using Unit 3 soil properties will be performed following the same methodology used in the ESBWR Standard Plant Service Building seismic SSI analyses.

#### Inspections, Tests, Analyses, and Acceptance Criteria

Table 2.4.17-1 provides a definition of the inspections, tests, and/or analyses, together with associated acceptance criteria for the Service Building.

## Table 2.4.17-1 ITAAC for the Service Building

De	sign Commitment	Inspections, Tests, Analyses	Acceptance Criteria
1	Determine if the Unit 3 soil properties meet the site parameters in DCD Tier 1 Table 5.1-1. If not, then Unit 3 site-specific seismic soil-structure interaction (SSI) analyses using the Unit 3 soil properties will be performed for the Service Building (SB). The Unit 3 SB site-specific seismic SSI analyses shall follow the same methodology used in the ESBWR SB seismic analyses specified in DCD Tier 1 ITAAC Table 2.16.10-1.	Unit 3 soil properties will be determined. Site-specific SSI and structure-soil-structure interaction (SSSI) analyses of the SB will be conducted, if necessary.	The Unit 3 soil properties either 1) meet the site parameters in DCD Tier 1 Table 5.1-1, or 2) site-specific SSI analyses will be conducted. The results of Unit 3 site-specific seismic SSI analyses of the SB are compared with the ESBWR SB seismic responses presented in DCD Tier 1 ITAAC Table 2.16.10-1 seismic analyses to confirm the Unit 3 SSI is adequate for the ESBWR SB seismic design.

## 2.4.18 **ITAAC for the Ancillary Diesel Building**

#### **Design Description**

The Ancillary Diesel Building is a Seismic Category II building. The design and analysis of the Ancillary Diesel Building will preclude any adverse interaction with Seismic Category I structures, considering the soil properties. If necessary, soil-structure interaction (SSI) analyses using Unit 3 soil properties will be performed following the same methodology used in the ESBWR Standard Plant Ancillary Diesel Building seismic SSI analyses.

#### Inspections, Tests, Analyses, and Acceptance Criteria

Table 2.4.18-1 provides a definition of the inspections, tests, and/or analyses, together with associated acceptance criteria for the Ancillary Diesel Building.

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
<ol> <li>Determine if the Unit 3 soil properties meet the site parameters in DCD Tier 1 Table 5.1-1. If not, then Unit 3 site-specific seismic soil-structure interaction (SSI) analyses using the Unit 3 soil properties will be performed for the Ancillary Diesel Building (ADB). The Unit 3 ADB site-specific seismic SSI analyses shall follow the same methodology used in the ESBWR ADB seismic analyses specified in DCD Tier 1 ITAAC Table 2.16.11-1.</li> </ol>	Unit 3 soil properties will be determined. Site-specific SSI and structure-soil-structure (SSSI) analyses of the ADB will be conducted, if necessary.	The Unit 3 soil properties either 1) meet the site parameters in DCD Tier 1 Table 5.1-1, or 2) site-specific SSI analyses will be conducted. The results of Unit 3 site-specific seismic SSI analyses of the ADB are compared with the ESBWR ADB seismic responses presented in DCD Tier 1 ITAAC Table 2.16.11-1 seismic analyses to confirm the Unit 3 SSI is adequate for the ESBWR ADB seismic design.

## Table 2.4.18-1 ITAAC for the Ancillary Diesel Building

## 3. North Anna 3 Proposed License Conditions

To be provided later.